



**Smarter Regulation of Waste in Europe
(LIFE13 ENV-UK-000549)
LIFE SMART Waste Project**

Action B15:

Intervention Bundle 2 - Illegal Haulage of Waste (final report)

Prepared by Iain Wright SEPA
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List of abbreviations

Term	Definition
ACR+	Association of Cities and Regions for Sustainable Resource Management
BE-LB	Brussels Environment (Bruxelles Environnement – Leefmilieu Brussel)
BTP	British Transport Police
CIWM	Chartered Institute of Waste Management
DVSA	Driver and Vehicle Standards Agency
EA	Environment Agency
EU	European Union
FTA	Freight Transport Association
HMRC	Her Majesty's Revenue & Customs
LIFE	EC Financial Instrument for the Environment
LSW	LIFE SMART Waste
NIEA	Northern Ireland Environment Agency
NRW	Natural Resource Wales
OTC	Office of the Traffic Commissioner
RHA	Road Haulage Association
SBRC	Scottish Business Resilience Centre
SEPA	Scottish Environment Protection Agency
UK	United Kingdom of Great Britain and Northern Ireland
WCR	Waste Carrier Register (SEPA)

List of LIFE SMART Waste project technical actions¹

No.	Description
B1	Design innovative intelligence communication hub
B2	Develop waste crime intelligence gathering strategy
B3	Design and demonstrate innovative methods to understand and analyse competitive behaviour in waste businesses and market trends ('Competitive Intelligence')
B4	Build innovative emerging threat and predictive analysis approach ('Horizon Scanning')
B5	Develop innovative waste flow audit approaches
B6	Develop innovative financial investigation approaches
B7	Develop innovative ways to use waste flow tracking devices
B8	Develop, pilot and evaluate Remote Sensing techniques
B9	Deploy and test intelligence communication hub
B10	Undertake investigation to fill intelligence gaps and pilot innovative investigatory tools
B11	Produce intelligence reports including recommendations for interventions
B12	Scope out barriers to joint working between agencies nationally and trans-nationally on interventions to tackle waste crime
B13	Specify how to set up group structures to overcome barriers and deliver joint interventions
B14	Create innovative interventions menu and design manual for selecting interventions
B15	Set up cross-agency intervention groups and deliver interventions to tackle waste crime issues associated with 'challenging' waste streams
B16	Produce recommendation reports for policy and legislative interventions

¹ As per the project's EC Grant Agreement for LIFE funding, key project deliverables are denoted by alphanumeric actions throughout the report (e.g. Actions B1, B2, B3, etc.).

1.0 Executive Summary

This report refers to the second bundle of interventions which has been developed and delivered by the LIFE SMART Waste Interventions Team.

Based on Intelligence Report 1, produced under Action B11 (Gay M. , 2017a) it was assessed that waste is vulnerable at four particular points:

- i. Production;
- ii. Transportation;
- iii. Warehousing;
- iv. Disposal.

Under Action B15 which is to 'set up cross agency intervention groups and deliver a minimum of three packages of interventions' it was decided to use an interventions approach as a means of addressing one vulnerability in the chain, that of transportation.

Utilising the Intervention Design Manual (Cambrensis, 2017), previously tested by the LIFE SMART Waste project, an Expert Group was formed in March 2018 and developed an overall objective for the second bundle of interventions to:

'Reduce hauliers' involvement in illegal movements of waste in order to reduce the impact of illegal carriage of waste in the sector'.

In order to achieve the objective, there were six main bundles of interventions: intelligence gathering, awareness raising, education, media campaign, operational activity and industry liaison.

A crucial component of this bundle of interventions was seen to be education and awareness of some hauliers' involvement in waste crime to their peers and customers. To this end, a campaign to raise awareness of the issue of illegal waste haulage was activated by SEPA and dissemination partners during September-October 2018. The campaign called upon the waste haulage industry and the public to take action to 'Drive out waste crime'.

In September and October 2018 high visibility operational activities were undertaken by partner agencies, generating significant media coverage and supported by a social media campaign. 418 vehicles were stopped, 122 offences were recorded and a number of warnings were issued to hauliers. Investigations these activities contributed to include ongoing environmental crime, human trafficking, prostitution, immigration offences, drugs and terrorism. Partially as a result of this activity, Police Scotland have amended their approach to partnership working on the roads network and will form a group to combat crime on the roads network which will include SEPA.

During October and November 2018 tactical level interventions took place with trade groups and industry partners. These included the first Trade Advisory Group meeting and collaboration with other regulators. The Trade Advisory Group in particular was a significant success and will likely continue beyond the life of the project and be led by a partner organisation.

Throughout the period of the intervention, work has been ongoing with partners to develop new technological solutions to combat waste crime and pilot new models of multi-agency working. These include a roadside mobile app being developed with DVSA, though it is likely that this will extend beyond the life of the project.

During this bundle of interventions the Interventions Model was successfully utilised and adapted to achieve the objectives set by the Expert Group.

Intervention Bundle 2 undertaken by the LIFE SMART Waste team should be considered a successful application of the Intervention Design Manual.

2.0 Introduction

This report provides information on the final progress and assessment of the second intervention bundle under LIFE SMART Waste Action B15, 'to set up cross agency intervention groups and deliver a minimum of three packages of interventions' to tackle waste crime issues associated with challenging waste streams.

The LIFE SMART Waste project was set up in 2014 for a 5-year period to tackle problematic waste streams by developing and using innovative methods. A key component of the project in the development of such innovation is to identify vulnerabilities in the waste sector, identify and overcome barriers to partnership working and design/implement potential solutions which seek to provide preventative, reactive, remedial and proactive solutions to waste issues which routinely are 'under the regulatory radar'.

A review of the project's first Intelligence Report (Gay M. , 2017a) indicated that waste is vulnerable at four particular points:

- i. Production;
- ii. Transportation;
- iii. Warehousing;
- iv. Disposal.

Under action B15, it was decided to use an interventions approach as a means of addressing one vulnerability in the chain, that of Transportation. Whilst the focus of Intervention Bundle 2 is 'illegal transportation of waste', it is important to note that its scope also covers the legal transport of illegal waste. This is in recognition that legitimate operators may transport illegal waste types, and illegal operators may transport legal waste types.

Intervention Bundle 2 was co-ordinated by the SEPA LIFE SMART Waste Interventions Team and involved multi-agency collaboration.

The intervention ran from March 2018 to November 2018 and will continue beyond the life of the project following the implementation of the Education and Enforcement phases of the Intervention Bundle with key partners taking forward activities and contributing to the success of Intervention Bundle 2.

This report provides information and data and explains the process undertaken, outlining the strategic objectives, operating model, performance measurements and governance process.

3.0 Background

3.1 Intervention Bundle 1

During the initial intelligence gathering phase of Intervention Bundle 1 (Wright & Rowatt, 2018), which dealt with Warehousing, it became apparent that all waste which had been warehoused illegally had been moved and transported to the location. No evidence could be found that illegal waste found in warehouses had been produced at that location.

A key finding from the intelligence Report for Intervention Bundle 1 was:

"A further vulnerability within the waste cycle that gives cause for concern is the transportation of some waste types. The most prominent illegal activity centres on haulage companies and unlicensed waste carrier operators. SEPA intelligence suggests that some hauliers are engaged in unauthorised depositing of waste material at various sites".

The impact of illegal warehousing of waste was documented in the final report of Intervention Bundle 1. That report indicated that we are aware of four serious incidents involving the illegal warehousing of waste in Scotland over the past two years. Some of these involved the transportation and warehousing of waste from other parts of the United Kingdom and beyond.

3.2 Scope and scale of illegal transportation of waste in Scotland

Under Action B10, an intelligence product was commissioned to assess the scale and scope of the illegal movement and transportation of waste in Scotland.

An intelligence gathering strategy was developed in November 2017 and is attached as [Annex I](#).

In summary, the initial intelligence report highlights a potential gap in our understanding of the "customers" of illegal waste sites in both Wales and Scotland, i.e. the characteristics of waste hauliers. Our current information gaps include:

- The attributes of hauliers involved in waste crime:
 - company size
 - awareness of waste legislation (e.g. Registered Carrier, Duty of Care)
- Methods of operating (Modus Operandi):
 - how are hauliers engaged to carry waste (to illegal sites)
 - how deposition locations are identified and communicated
- The effectiveness and outcomes of our existing interventions:
 - Are our interventions effective at preventing and deterring hauliers from using illegal sites?

The conclusion and recommendations section of the Hauliers intelligence report concluded:

'The most apparent theme to emerge from this phase of the project is that this industry can be transient and covert in its practices, and we as regulators rely on the honesty of operators to inform us on what is going on. The questions we have posed for the collaborative group as well as the observations we have made about this industry have shown us that this practice needs to change and we need to be able to gather information independently as well (sic)to ensure that we leave little room for unscrupulous behaviour.

'As we have mentioned, we have posed a number of questions for the collaborative working group, (Expert Group) but it is clear that further understanding of certain elements are required before attempting to 'solve' these questions.'

3.3 Collaborative and partnership working

In order to be successful, meaningful collaborative and partnership working is essential if a significant impact is to be made on the illegal haulage of waste.

In common with the findings of the LIFE SMART Waste Intelligence reports² which formed the basis of the activities undertaken and the focus for interventions, it was necessary to identify issues affecting joint working in tackling waste crime and highlight particular common barriers that make collaborative and partnership working more difficult.

Similarly, Intervention Bundle 2 recognised that true, effective collaborative working would be challenging, as it was during Intervention Bundle 1, which tackled the illegal warehousing of waste.

Barriers to partnership working exist and the intelligence reports, as outlined above, identified common issues which affected partnership working and where possible allowed solutions to be found and used.

² Intelligence Report No. 3: Waste haulier involvement in cross-border criminality, UK (Gay M. , 2018); Barriers to joint working - Issues affecting joint working in tackling waste crime (Gay M. , 2015); Overcoming barriers to joint working - Group structures required (Gay M. , 2017b).

4.0 Development of Intervention Bundle 2

It is against this background that the 'Hauliers Intervention' (Intervention Bundle 2) was developed as part of Action B15. This section outlines the workflow and key considerations. This bundle of interventions was developed using the lessons learned from Interventions Bundle 1 (warehousing) and has informed Interventions Bundle 3 (Brokers).

4.1 Intervention target

The target of Intervention Bundle 2 was identified through the LIFE SMART Waste project's first intelligence report (Gay M. , 2017a)³. This report identified that waste was vulnerable to criminal exploitation during production, transportation, warehousing and disposal and interventions were considered at each of these stages.

Subsequently, the 'illegal transportation of waste' was considered to be the most appropriate vulnerability to target with the project's second intervention, incorporating the learning points from Intervention Bundle 1 (warehousing).

4.2 Intervention design

4.2.1 Application of the Intervention Design Manual

The Intervention Bundle 2 was developed utilising the [Intervention Design Manual](#) (Cambrensis, 2017)⁴ which was developed under Action B14. The exception to the design was that the iDEPEND software was not utilised due to technical issues. This analytical/assessment function was carried out by the members of an Expert Group.

4.2.2 Expert Group

Having identified the target of the intervention, key intervention partners were identified as an early priority. The formation of an appropriate Expert Group was seen as a key dependency for delivering an effective Intervention Bundle.

The early identification of key partners and their inclusion in the initial design phase of the Intervention Bundle meant they had an investment in the Intervention Bundle and increased the likelihood of a successful design and implementation. The Expert Group was established and first met in March 2018, with subsequent meetings in August and October 2018 (as detailed in [Annex VIII](#)).

The Expert Group for Intervention Bundle 2 included enforcement agency and industry representatives from:

- Axa Insurance
- British Transport Police
- Driver and Vehicle Standards Agency
- Her Majesty's Revenue & Customs
- Office of the Traffic Commissioner
- Road Haulage Association
- Scottish Business Resilience Centre
- SEPA
- Zurich Insurance

³ Action B11 - *Intelligence Report 1: Review of SEPA and NRW intelligence.*

⁴ Action B14 - <https://www.sepa.org.uk/regulations/waste/life-smart-waste/publications/intervention-design-manual/>

Whilst SEPA were not necessarily the most appropriate agency to lead Intervention Bundle 2, the Expert Group determined that, as a LIFE SMART Waste project initiative, SEPA should lead it.

4.2.3 Problem Statement

Building on the experiences gained in Intervention Bundle 1, a Problem Statement was produced at the first meeting of the Expert Group in March 2018 ([Annex VII](#)).

The objective of Intervention Bundle 2 set out in the Problem Statement was to, 'Reduce hauliers' involvement in illegal movements of waste and reduce the impact of illegal carriage of waste in the sector'.

This formed the basis as a Terms of Reference for the Expert Group and was identified as the best means of driving the implementation of Intervention Bundle 2.

During the first meeting of the Expert Group, it became apparent that no one agency or partner organisation had full oversight or legislative powers to deal with the haulage issue on their own. This was identified and included in the Problem Statement.

4.2.4 Haulier intelligence report

Drawing upon the experience of partners and the findings of Intervention Bundle 1, the Expert Group determined that there was insufficient intelligence to move forward to the Design and Implementation phases of the Intervention Bundle. This was subsequently addressed by the commissioning of the Hauliers Intelligence Report, (Gay 2018) and tailoring the intervention design accordingly.

Beginning with the first meeting in March 2018, the Expert Group identified and developed a bundle of interventions designed to tackle the illegal haulage of waste.

Six main bundles of interventions were identified: intelligence gathering; awareness raising, education; media campaign; operational activity; and industry liaison.

Enforcement activity was not seen as a primary requirement for Intervention Bundle 2. A much greater emphasis was placed on the role of education and influencing operators in the waste management and haulage industry through trade associations and peers.

The Expert Group determined that an education and awareness raising campaign was likely to have more success when used in conjunction with high visibility operational activities.

This shaped the final design and implementation of Intervention Bundle 2 as detailed below in:

- Section 5.0 – 'Awareness-raising campaign'
- Section 6.0 – 'Multi-agency operational activity'

4.3 Overcoming barriers to joint working

The design of Intervention Bundle 2 was guided by the five recommendations from the project's B13 report on overcoming barriers to joint working (Gay M. , 2017b)⁵:

⁵ Action B13: Overcoming barriers to joint working: Group structures required. Link: https://www.sepa.org.uk/media/340378/lsw_b13_partnership-working-report_v10.pdf

- i. Development of flowcharts and checklists;
- ii. The design of a terms of reference outlining aims and objectives, and defining individual roles and responsibilities. This took the form of a Problem Statement;
- iii. The design of an integrated communications strategy;
- iv. The development of an internal audit approach to keep the partnership focused on the agreed priority;
- v. The development of a partnership agreement pro-forma.

4.3.1 Development of flowcharts and checklists

This step was considered in the first meeting of the Expert Group, and these elements were used in the running of the meetings. However, it was felt by the Expert Group that the nature of the issue could be addressed better by recording of minutes and issuing of actions. Issues were dealt with as they arose by the LIFE SMART Waste team and the minutes distributed to attendees as soon as practicable following the three meetings which were held ([Annex VIII](#)).

4.3.2 Design of Terms of Reference

The terms of reference were set out in the Problem Statement ([Annex VII](#)) which was produced as a result of utilising the Interventions Manual. It was felt by the Expert Group that a formal Terms of Reference document would in effect be a duplication of the Problem Statement.

Key roles as would have been defined in the terms of reference were fulfilled by the LIFE SMART Waste team. There was a hope that another partner agency would lead on Intervention Bundle 2. However, as was the experience in Intervention Bundle 1, no partner agency volunteered for this role and SEPA's LIFE SMART Waste project personnel again led this bundle of interventions. (This was overcome in Interventions Bundle 3 by not identifying the issue and allowing the Trade Advisory Group identify the problem and potential solutions).

It is hoped that other agencies will be more willing to take a leadership role in future Interventions. However, there seems to be a feeling amongst partners that if an organisation identifies an issue and thereafter convenes a meeting then they should lead on that issue.

Whilst a Terms of Reference was not used in this bundle of interventions, its use should be considered on a case by case basis. The Trade Advisory Group was set up as it covers all of the issues identified in the aforementioned intelligence report.

4.3.3 Design of an integrated communications strategy

The Communications strategy developed in support of Intervention Bundle 2 is outlined in Section 5.0 of this report.

4.3.4 Development of an internal audit approach

Regular audit activity to keep the partnership focused on the agreed priority was carried out before and after every Expert Group meeting. This allowed the prompt circulation of minutes and actions to ensure that partners maintained their focus on the objective of Intervention Bundle 2 and responded with any concerns, queries etc.

The Expert Group agreed that concise accurate minutes and actions distributed promptly was a good model to adopt, and it is hoped that future interventions will adopt this approach.

4.3.5 Development of a pro forma partnership agreement

The Expert Group were not enthusiastic towards a formal partnership agreement being drawn up in respect of this bundle of interventions. Their reasoning was that they had agreed to become involved and would continue to do so. However they did not feel it was necessary to formalise this commitment. One opinion was that if there was a formal partnership agreement, they would have to approach senior managers and/or seek legal advice to check the wording of any agreement.

The use of partnership agreements will continue to be reviewed.

4.4 Intervention lead

For the duration Intervention Bundle 2, the Expert Group retained their opinion that the bundle of interventions should continue to be led by LIFE SMART Waste project personnel.

At the first and third meetings of the Expert Group, the facilitator gave members the option to assume the lead of the intervention, or at least one element of Intervention Bundle 2. None came forward and partners maintained the view that as SEPA's LIFE SMART Waste project team had called the first meeting and identified the issue, they should continue to lead Intervention Bundle 2.

There was a slightly different approach taken by the Trade Advisory Group during its first meeting on 21 November 2018 due to empowering them to articulate the problem and suggest solutions that the project could help them with. At this meeting when the question was asked (as per the Interventions Design Manual) who was best placed to lead this particular part of the interventions bundle, a volunteer organisation came forward. It is anticipated that the interventions lead will be formally handed over to this organisation at the second meeting which is scheduled for February 2018.

5.0 Awareness-raising campaign

5.1 Communications strategy

Guided by the intervention's Expert Group of industry and enforcement agency representatives, a communications strategy was developed by the LIFE SMART Waste Communications Officer to support Intervention Bundle 2.

The strategy focused on the creation of a campaign to raise awareness of illegal activity within the UK waste haulage sector (highlighting the issue of cross-border movements of waste between Scotland and the rest of the UK).

The campaign was developed and activated by SEPA with support from a range of dissemination partners during September-October 2018.

5.2 Campaign audience and objectives

The campaign was designed to target the waste haulage industry and the general public, calling upon them to take action to 'Drive out waste crime'.

The specific objectives were to:

- i. Raise industry (and public) awareness of their responsibilities relating to waste haulage and disposal;
- ii. Raise public (and industry) awareness of the impact of waste crime and encourage the reporting of suspected illegal transportation/dumping by hauliers.

5.3 Campaign messaging

The campaign incorporated a number of overarching corporate messages for all stakeholders to provide context for communications tailored to the target audiences:

Table 1 - Tailored campaign messaging

Audience	Key messages
All stakeholders	<ol style="list-style-type: none">i. The LIFE SMART Waste project is working with partner agencies to 'divert, deter, detect and disrupt' illegal waste haulage⁶.ii. Illegal waste management generates adverse environmental, social and economic impacts.iii. SEPA will not tolerate waste crime and will take action against those who seek to profit from waste crime.
Industry	<ol style="list-style-type: none">i. Anyone who produces, stores, transports or manages waste has obligations under Waste Duty of Care legislation.ii. Hauliers may be committing an offence by transporting or illegally disposing of waste without the required permissions and this could leave them liable to prosecution and operational sanctions.

⁶ Mirroring the objectives of the 'Four Strands' approach (Serious Organised Crime Taskforce, 2016)

Audience	Key messages
Public	<ul style="list-style-type: none"> i. We all have a role to play in protecting our environment by being vigilant ii. Report any suspicious or unusual behaviour.

5.4 Campaign implementation

5.4.1 Information flyers

Printed and electronic versions of a ‘Drive out waste crime’ information flyer were produced as assets for alerting licensed waste carriers and the broader haulage industry to their waste duty of care obligations and responsibilities.

During the intervention design, it was acknowledged other European nationals operating within the UK haulage industry would benefit from greater awareness of their waste Duty of Care obligations. In recognition of this, translated versions of the flyer - [English](#) (LIFE SMART Waste, 2018); [Polish](#) (LIFE SMART Waste, 2018); [Romanian](#) (LIFE SMART Waste, 2018); and [Lithuanian](#) (LIFE SMART Waste, 2018) - were published online and printed for distribution via road stops, service stations and direct mail.

SEPA commenced mailings of the information flyer to a 9,200-strong SEPA Waste Carrier Register on 20 September. Throughout 2018-2019 the flyers will be sent to new registrants and also enclosed with licence reminder letters which are sent to existing registered waste carriers.

5.4.2 Dissemination through industry partners

As outlined in Section 6.0, SEPA engaged directly with key industry stakeholders to obtain support for the campaign and commitment to disseminating information to their members (via their web sites, e-newsletters and social media).

To reach the waste haulage industry, campaign materials were shared with the: Freight Transport Association; Road Haulage Association; Transport Association; and British International Freight Association.

Further dissemination support was elicited from related industry stakeholders, including: the National Farmers Union; British Insurance Brokers Association; AXA Insurance; and Zurich Insurance.

5.4.3 Media relations

A joint [news release](#)⁷ (SEPA, 2018) in support of the multi-agency operations, with contributions from the Environment Agency, Police Scotland and Scottish Business Resilience Centre, was released on 4 October attracting significant national, regional and online media interest.

The media coverage (as summarised in [Annex III](#)) focused primarily on the cross-border illegal waste movements and highlighted that the project was making a significant investment to address the issue. The extent of coverage exceeded expectations and

⁷ SEPA News release (04/10/2018): <http://media.sepa.org.uk/media-releases/2018/sepa-joins-forces-with-uk-agency-and-industry-partners-to-drive-out-waste-crime/>

demonstrated a significant interest in the issue of cross-border transfers of waste for illegal disposal.



Following the formation of a Waste Trade Advisory Group in November 2018, trade press support for the campaign was also evident in the form of further editorial coverage and pro bono campaign advertising space (Skip Hire Magazine, December 2018 edition – [Annex IV](#)).

5.4.4 Digital media

SEPA and supporting partners undertook complementary digital dissemination activity to highlight the multi-agency operations and the ‘Drive out waste crime’ campaign.

As illustrated in [Annex V](#). SEPA used a combination of web, social media and e-newsletter channels. SEPA’s initial activity focused on promoting a dedicated video (Video 1, Table 2) and highlighting coverage by well-known news media outlets.

Table 2 – ‘Drive out waste crime’ video assets

Video 1: Multi-agency action	Video 2: Drive out waste crime campaign
 <p>https://youtu.be/ZF8NQYGQ3hE</p>	 <p>https://youtu.be/Q1Kwaeaa-hY</p>

Supporting digital dissemination by partner organisations – including the Road Haulage Association, Police Scotland, Scottish Police Federation, Environment Agency (NW), Environment Agency (NE), SBRC, Net Regs and ACR+ - is summarised in [Annex VI](#).

5.4.5 Social media advertising

Building upon the significant awareness raised through news media coverage of the multi-agency operations (and supporting digital dissemination), a short *Drive out waste crime* video was developed for use in a social media advertising campaign. The purpose of the video was to raise awareness of the issue of illegal waste disposal and to ask the Scottish public to report suspicious activity.

The video (Video 2, Table 2) was posted via SEPA’s Twitter, Facebook and LinkedIn platforms on 24 October 2018. To extend beyond SEPA’s organic social media reach, Facebook and Twitter advertising was undertaken for an additional five days - up to 31 October 2018 - targeting adults (18 years+) in Scotland.

As illustrated in Table 3, the advertising significantly increased the campaign’s overall reach and engagement with the Scottish public.

Table 3 - SEPA social media advertising campaign (24-31 October 2018)*

‘Drive out waste crime’ post/video (24-seconds)*									
Platform / link	REACH (impressions)**				ENGAGEMENT				
	Organic	Paid	TOTAL	CPT*** (£/000)	Video views			Post****	
Twitter	3,599	183,999	187,598	£3.01	32,233	17%		556	0.3%
FaceBook	5,061	45,847	49,980	£4.36	26,519	53%		785	1.6%
TOTAL	8,660	229,846	237,578	£3.28	58,642	25%		1,326	0.6%

* Snapshot of metrics at 07/11/2018
** Posted 24/10/2018 and promoted 26/10/2018 – 31/10/2018
*** CPT = Cost per thousand paid impressions
**** Total number of post clicks, reactions, comments, shares

Inclusive of organic (unpaid) reach, this execution of the overall *Drive out waste crime* campaign created in excess of 237,500 opportunities to see campaign content.

Notably, although the campaign placed an emphasis on Twitter (73% of total expenditure), the Facebook platform delivered a significantly better level of engagement with the post and video. As a percentage of total impressions, for example, 53% of the Facebook audience viewed the video compared with only 17% of the Twitter audience. Despite a 45% higher cost per impression, Facebook’s superior rates of engagement proved to be significantly more cost effective for this campaign.

Acknowledging that a multi-platform approach will help us to reach a wider demographic, this superior performance indicates that increasing the weighting of expenditure via the Facebook platform could significantly improve overall levels of engagement in future public-facing campaigns.

6.0 Multi-agency operations

6.1 Intervention partners

Intervention Bundle 2 partners included:

- SEPA;
- Police Scotland;
- British Transport Police;
- Driver and Vehicle Standards Agency;
- Office of the Traffic Commissioner;
- Her Majesty's Revenue and Customs;
- Scottish Business Resilience Centre;
- Natural Resources Wales;
- Environment Agency;
- Northern Ireland Environment Agency.

6.2 Operational intervention activities

During September and October 2018 a series of high visibility activities were undertaken by intervention partners. The aim was to highlight the issue of illegal haulage of waste and to educate hauliers (and the public) about Waste Duty of Care obligations and the potential sanctions for any illegal activity.

As outlined in Table 4, vehicle checks took place in Northern Ireland, England, Wales and Scotland during this period. In support of this activity, and co-ordinated by SEPA, each agency arranged its own publicity.

Table 4 - Summary of multi-agency operations

Timing (2018)	Activity
20-21 September	Out-of-hours road stops on the A75 at Glenluce in Dumfries and Galloway, specifically targeting lorries and vans travelling to and from ferry crossings to Northern Ireland.
01 October 2018	SEPA accompanied the DVSA and British Transport Police to an unlicensed scrap metal site. The specific aim of this visit was to look for possible signs of metals theft or stolen vehicles.
02 October 2018	SEPA working with Police Scotland carried out pro-active patrols of A1 using ANPR technology.
03 October 2018	Multi-agency road stops on the A74 (M) and A1 to address the cross-border movement of waste within the UK for unauthorised disposal. Enforcement partners also addressed road traffic offences and the movement of other potential illicit goods.
04 October 2018	SEPA working with Police Scotland carried out pro-active patrols of A1 using ANPR technology.
08 October 2018	Multi Agency road stops in Gwynedd, Rhondda Cynon Taf and Merthyr Tydfil, Wales to address the illegal movement of waste in Wales for unauthorised disposal. Enforcement partners also

Timing (2018)	Activity
	addressed road traffic offences and the movement of other potential illicit goods. Site visits by NRW and Police in Pembrokeshire
09 October 2018	Multi Agency road checks in Conwy and Merthyr Tydfil, Wales to address the illegal movement of waste in Wales for unauthorised disposal. Enforcement partners also addressed road traffic offences and the movement of other potential illicit goods
10 October 2018	Multi Agency road checks in Denbighshire, Swansea, Neath Port Talbot, Carmarthenshire and Rhondda Cynon Taf, Wales to address the illegal movement of waste in Wales for unauthorised disposal. Enforcement partners also addressed road traffic offences and the movement of other potential illicit goods
September – October 2018	Multi Agency road checks and site visits carried out by Environment Agency in North East and North West England. Full details still to be ascertained

A table of results of the high-visibility operational activity is included in [Annex IX](#).

6.3 Tactical multi-agency activities

6.3.1 Summary of Results

The overall results available from participating agencies indicated that 418 vehicles were stopped, 122 offences were recorded and a number of warnings were issued to hauliers as well as the distribution of a significant amount of educational materials in English and three European languages as detailed below. The activity also flagged 26 vehicles of interest and provided potentially useful intelligence to support ongoing investigations. These investigations include ongoing environmental crime, human trafficking, prostitution, immigration offences, drugs and terrorism.

6.3.2 Ongoing dissemination

As outlined in Section 5.4, printed copies of the 'Drive out waste crime' campaign leaflets were distributed in service stations and truck stops along main arterial routes to support the high visibility multi-agency road checks.

The Office of the Traffic Commissioner agreed to include an input on waste crime and hauliers in their New Operator Seminar, which is delivered by DVSA.

The Scottish Business Resilience Centre distributed hard copy leaflets through their traffic infrastructure contacts as well as raising the issue with Police Scotland Executive Officers to consider including waste crime and waste on the move training for Police Officers.

The Road Haulage Association pro-actively distributed electronic versions of the campaign leaflets and associated material to their members.

The Fleet Transport Association agreed to disseminate electronic versions of the information leaflets to their members.

6.3.3 Tactical innovations

LIFE SMART Waste (SEPA) are working with DVSA to explore the value of developing a roadside 'app' for mobile devices. This technology is currently in use by DVSA inspection staff to provide real time vehicle and operator information to roadside inspection staff. There is a potential to develop this app further to include waste carrier/permit/licence information which can be 'regionalised' for each and every environmental regulator in Europe and possibly beyond. A further development of this app includes the potential to obtain vehicle insurance details at the roadside, and this is to be further explored with the Motor Insurance Bureau. It is anticipated that this aspect of the bundle of interventions would extend beyond the life of the project.

LIFE SMART Waste (SEPA) are in exploratory discussions with insurance companies to assess if sanctions could be applied to insurance clients who are in breach of environmental law or do not have a tracker installed on their vehicle. It is not yet known if this will develop fully due to commercial considerations and legal issues.

Following involvement with Intervention Bundle 2, Police Scotland are considering setting up a unit to deal specifically with tackling illegal activity by hauliers of all types. It is anticipated that SEPA / LIFE SMART Waste will be invited to be permanent members of this multi-agency unit which embodies the interventions philosophy.

Police Scotland's Roads Policing Unit is evolving their method of arranging multi agency road checks. Following the operational activity in September/October 2018, where Police Scotland were key partners, after a period of re-organisation they have agreed that partners will be able to bid for road check priorities and locations instead of these being purely police driven. This is a major step forward in multi-agency working and partnership contribution in Scotland.

6.3.4 Trade Advisory Group

The Expert Group recommended that a sub group be brought together to utilise road haulage industry and trade association insights to broaden the interventions knowledge base and utilise 'peer pressure' to bring about behavioural change. Trade association representatives felt that such a group would speak more freely and share more of their personal experiences if regulators were not present.

The first meeting of the Trade Advisory Group took place on 21 November 2018 in Manchester and was attended by representatives of the Recycling Association, Recoup, Freight Transport Association, Road Haulage Association, Chartered Institute of Waste Management, Canal and River Trust and Dsposal. This first meeting was a success due to the enthusiasm and 'buy in' from the group and, in accordance with the Interventions Design Manual, a discussion took place around who was best placed to lead the group. In this case a volunteer organisation came forward and it is anticipated a formal handover from LIFE SMART Waste will take place at the second meeting of this group which is scheduled for February 2019. A minute of the first meeting is included in [Annex IX](#). Another successful outcome from the meeting was an immediate safeguarding plan developed by the group to assist the Canal and Riverways Trust.

It is anticipated that this Trade Advisory Group will continue beyond the life of the LIFE SMART Waste project.

7.0 Learning points

The learning points for Intervention Bundle 2 were broadly similar to those in Intervention Bundle 1. These will be examined and will hopefully provide learning which will be of value to future Interventions.

7.1 Base intervention bundle on relevant current intelligence product

Whilst transportation of waste had been identified as a key vulnerability in the initial intelligence product, there was a lack of current, actionable intelligence available to design a bundle of interventions.

For Intervention Bundle 2 this issue was addressed by allocating a specific LIFE SMART Waste resource to develop a suitable intelligence product. This was made available to all Expert Group members and enabled specific, targeted intervention bundles to be undertaken.

7.2 Get relevant partners around the table

The initial meeting of the Expert Group in March 2018 was formed of internal and external partners whom the LIFE SMART Waste team felt could contribute to developing and implementing bundles of interventions.

Some invitees were unable to attend this initial meeting. The second and third meetings of the Expert Group involved different members from that initial meeting due to partner agency staff changes and more relevant members being identified.

It was key to the success of Intervention Bundle 2 that membership of the Expert Group was undertaken by decision makers and influencers from regulatory agencies and trade associations, in this case the Expert Group had both.

Intervention Bundle 2 was implemented more smoothly than Intervention Bundle 1. This was in part due to more SEPA staff being available and particularly due to the expertise, resourcing and enthusiasm of the Expert Group.

Once the Interventions approach was adopted by the Expert Group, they quickly gave detail on their experience and a number of potential interventions were suggested, debated and either discarded, pending or implemented.

Again, it was found that personal interaction and regular, informal communication was the key to keeping Expert Group members on board with the work being carried out and meeting the objectives they set. It is anticipated that the relationships formed during the meetings of the Expert Group process will extend beyond the life of the LIFE SMART Waste project.

7.3 Identify and select the most appropriate lead for the intervention

The Intervention Design Manual is clear in its guidance that the most appropriate agency should lead/chair the Expert Group and drive the delivery of the bundles of interventions.

As in Intervention Bundle 1, there was a reluctance by any of the statutory agencies or trade representatives to take the lead and despite being included in each meeting agenda, all members were of the opinion that the LIFE SMART Waste project should continue to lead the process.

This is a recurring theme in the LIFE SMART Waste project interventions and a challenge that is not fully addressed in the current iteration of the Intervention Design Manual.

However, it is anticipated that increased familiarity with the Intervention Design Manual, and the relatively new way of working it promotes, will make intervention partners more willing to take a lead role. Further assessment of the Interventions Design Manual during the project is required. Key to successful use of the manual is utilising it as a flexible, evolving model.

7.4 Keep Expert Group meetings short in duration and focused

All Expert Group meetings were limited to two hours duration, with a provision to extend up to six hours duration if required.

This format was adopted partly due to experience from Intervention Bundle 1 but also based on comments from members of the Expert Group that they could attend for 'a couple of hours', but could not afford a full day out of their diaries.

In order to accommodate this, the meetings were scheduled for 10:00 to allow travel time and coffee and lunch were provided. Provision of lunch at 12:00 allowed further, informal discussions to take place between Expert Group members if they wished, or to provide them with travel time back to their offices.

All members of the Expert Group commented that the short, sharp, focused, facilitated meetings were a strong driver in the dynamic, productive content of Intervention Bundle 2.

7.5 Adapt the Intervention Design Manual

The scope for adaptation of the [Intervention Design Manual](#) (Cambrensis, 2017)⁸ was demonstrated during this intervention by using it more intuitively. This tailored approach was taken to reflect the combined experience and skill sets of the LIFE SMART Waste project team and the assembled Expert Group. This was believed to be preferable to rigidly adhering to the Intervention Design Manual for addressing the issue of illegal waste haulage.

Based on previous experiences of piloting the Intervention Design Manual, the LIFE SMART Waste project team selected key elements of the guidance in the design of Intervention Bundle 2. For example, the iDepend software was not used and this enabled the Expert Group to directly assess whether a proposed intervention was likely to succeed and to what degree.

There appears to be scope for further adaptation and refinement of the Intervention Design Manual to make it a more practical tool for environmental enforcement agencies.

⁸ <https://www.sepa.org.uk/regulations/waste/life-smart-waste/publications/intervention-design-manual/>

8.0 Conclusions

The delivery of LIFE SMART Waste Intervention Bundle 2 can be viewed as a successful application of the Interventions Design Manual, demonstrating its value for designing and implementing bundles of interventions. In this instance, we have demonstrated that the Intervention Design Manual can be applied, and amended if required, to suit the problem identified and so make the greatest impact with the resulting interventions.

A strength of the interventions approach is that it allows several experts to formulate the most appropriate intervention with the highest likelihood of success. It also gives scope for the most appropriate agency/partner to lead and direct the intervention (although, in practice, this has proved to be challenging). It also gives an objective, defensible, evidence base to request resources to deliver implementation of the intervention which is based on practitioner experience.

There are challenges applying the Intervention Design Manual approach, not least the alignment of different organisational priorities. In this instance, SEPA and LIFE SMART Waste identified hauliers as a significant contributor to waste crime. Although many members of the Expert Group did agree with this assessment, not all key partners shared this view initially. The evidence provided by the Intelligence Product, however, served to provide a lever for all Expert Group members to agree that whilst tackling illegal haulage of waste may not be their organisation's priority, it was a priority for the Expert Group. This illustrates the clear benefit of providing relevant intelligence ahead of designing an intervention. A key learning point in this interventions bundle that it is more fruitful to produce a relevant intelligence product prior to calling together the Expert Group.

Whilst several of the individual bundles of Intervention Bundle 2 have been delivered, it is apparent that several will continue beyond LIFE SMART Waste and become 'business as usual'.

It is anticipated that the roadside 'app' for mobile devices, the Trade Advisory Group and Police Scotland Multi Agency Unit will all have an impact on the illegal haulage of waste in the longer term.

Key to the ongoing success of this approach will be sustained, successful and meaningful partnership working.

The use of the Interventions Design Manual is not always intuitive. However, if adapted to suit each identified problem, it provides a logical, structured approach which is evidenced and defensible.

On balance, it is felt that the Interventions Model is an effective tool which can be used to design, implement and, where necessary, justify innovative tactics and methodology to achieve a specific aim or outcome. In order to be truly effective, the model itself should be adapted to suit the particular approach recommended by the Expert Group in each bundle of interventions.

9.0 Recommendations

Based on Intervention Bundle 2, the following recommendations are made:

- i. The Interventions Design Manual is used as a business-as-usual investigatory tool by environmental regulators;
- ii. The Interventions Design Manual should be adapted as required to align with the issue(s) being addressed;
- iii. The use of the iDepend software to develop interventions should be at the discretion of the Expert Group;
- iv. Further research on the development and application of the roadside 'app' for mobile devices should continue beyond the LIFE SMART Waste project;
- v. The Trade Advisory Group should continue to meet at regular intervals and provide insight/experience on the haulage industry beyond the life of the LIFE SMART Waste project;
- vi. Membership of the Expert Group should be flexible and reviewed on a regular basis to ensure it assists in delivering the objectives set;
- vii. Intervention Bundle 2 should be reviewed by SEPA in twelve months to assess its impact on the illegal haulage of waste.
- viii. Utilise Facebook in future campaigns due to its success in respect of audience interaction.
- ix. Environmental regulators should be involved with Police led road crime group.

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Annex I – Intelligence Gathering Strategy

Hauliers Workshop

Location: Glasgow
Date: 12 October 2017

Strategy was agreed under the following terms.

‘Carry out an intelligence gathering strategy to understand the waste transportation industry on the UK in order to regulate and enforce more effectively.’

1. Are current industry regulations for the waste haulier industry adequately preventing crime within it?

The general consensus for this was that we did not know the extent of crime within the haulier industry, therefore we couldn't reliably understand whether regulations were acting as a preventative control. It was agreed that we needed to understand the waste market to gain a better overall understanding.

We discussed the definition of 'haulier' and whether 'White van man' would be included. We agreed that anyone transporting waste as part of a business would be classed as a haulier

We discussed the possibility of whether it would be in the interest of the producers of waste to use 'exemplars' in the industry as they are responsible for the waste. This would reinforce the idea of professionalising the industry as currently there are no professional standards. This could be used further on as an intervention.

Researching other EU countries and seeing whether they have any problems with hauliers. Is there a potential to use countries who have a lower rate of criminality in the haulage industry as a benchmark for our own results?

To fully be able to understand this question, we would be required to gather information from the following sources

- Legal and Illegal Hauliers – ones that have been prosecuted
 - o Could we ask these individuals who had been prosecuted whether they believed the regulations in place were preventative?
- Road Hauliers Association
- Intelligence from other Agencies
- Traffic Commissioner
- Fleet Transport Association
- Lorry Drivers Association
- HM Revenue and Customs
- Stops and Checks – Physical Searches – Operational Targets

2. What central bodies exist within the waste industry and how influential are they?

Would this be considered official/public bodies or different organisations within the waste sector? For example, can we only consider the influence of SEPA or NRW or should we also consider the influence Broker's have on the industry?

The difficulty exists in classifying what waste is – in every aspect of our regulatory work – some waste is sometimes a product. Germany send their waste tyres with less than 5mm tread to the UK who class this as a product.

Potential intervention: Sites not allowed to operate a weigh bridge without a regulating officer being present? This could increase the rate of fly tipping and waste crime, but may be an avenue worth exploring.

The producers could have a large impact on the haulage industry in that they could be responsible for controlling them.

The broker is a key player in the industry. They could be influencing where the waste is going.

How do we measure the impact a boy has on a specific industry? We don't have a baseline to measure this.

Environment Exchange – Stock market for waste. Acts as a commodities market. There is a 'universal' price for specific waste types. 'Let's Recycle' also have a lot of data in regards to market values.

Where do we get this information?

- Border Force
- Councils
- NRW/SEPA
- Producers
- Brokers

3. Are there any gaps and/or conflicting regulations within existing legislation relative to this industry?

We discussed the disparity between TFS sanctions and Duty of Care regulations, the former being very strict while the latter barely having any checks, especially when you can buy a carrier licence online.

This raised that point that at every question, we should be bringing our answer back to 'how does this make the haulage industry vulnerable to criminality?'

The culture of the regulators as well as the regulatory system can also make the haulage industry vulnerable to crime?

There is a conflict between the government strategy of allowing businesses to flourish rather than being weighed down by bureaucracy and ensuring that businesses adhere to environmental regulations – especially when more responsibilities are placed on those waste businesses.

Another conflict we discussed was the idea of organisations going around prisons and advertising the waste industry as a perspective livelihood after being released from prison as a form of offender rehabilitation.

The waste industry is also a good way to launder money – another conflict.

Where can we get this information?

- Regulators

4. Are the current enforcement activities of SEPA and others adequately reducing crime within this industry?

Despite many feeling that regulators are excellent at prosecuting criminal behaviour, they believed this was the wrong way to approach the situation, and we should be striving to make it less attractive in the first place.

It was also noted that the financial penalty that some are ordered to pay after sentencing doesn't really act as a deterrent as the industry is so lucrative, and we might be better placed ordering offenders to complete community service or something similar. There is a disparity between the potential profit made from illegal waste haulage to the possible penalties.

The general feeling was that despite the regulations being good, regulators were not good at enforcing them. There is the culture of the organisation that acts as a barrier and perhaps we should be seizing more vehicles and generally acting more lawfully audacious. Do our organisations think of enforcement as a failure?

Where do we get the information?

- Regulators
- Offenders
- Annual Waste Report

5. Does the market structure of the waste haulage industry facilitate criminal behaviour within it?

We can't really answer this question as we do not know the current market structure, however, landfill tax can and has impacted criminality and we need to identify if there are any barriers.

Where do we get the information?

- The Haulage Industry
- Producers
- Trade Bodies
- Fleet Services
- Brokers

6. Are there any particular characteristics of this industry that expose it to exploitation by criminals?

The first characteristic we discussed was the disparity between profit and fines. When the potential profit of illegal waste haulage is so high and the penalties are so low by comparison, this particular industry can be 'worth the risk' to possible offenders.

We as regulators also heavily rely on the honesty of individuals to give us a picture of the industry, which inevitably leads to some not telling regulators the whole truth. Specifically in regards to the haulage industry, we also have no control over the vehicles that they use which certainly presents itself as a vulnerability to regulators. Is there a possibility for an intervention here where trackers are placed in all haulage vehicles that we can use to compare to transfer notes?

Where do we get the information?

- Post arrest interviews and talking to hauliers
- Subcontractors
- Ask exemplar companies how they run their business.

- Not one agency can provide this answer, to get to whole picture, we should go to the following agencies finding the relevant information:
 - SEPA/NRW for licence information
 - HGV Licences
 - Traffic Commissioner for Roads
 - HM Revenue and Customs for Tax information

7. Does the transportation and trading of waste present opportunities for criminal activity within the waste haulage industry?

The answer to this question appears to be yes, but we would require a more detailed picture of the industry.

Where do we get the information?

- Hauliers
- Environment Exchange
- Brokers
- Law Enforcement
- Border Agencies
- SIENNA – Europol
- PRN Package recovery notes
- HM Revenue and Customs
- Post arrest Interviews
- Trade bodies.

8. How is the waste haulage industry conducive to other types of criminal activity?

The simple answer to this is that we don't know, however it would be good to gather evidence on this issue to better understand if there is a problem or not. The main areas we may be able to identify other areas of crime would be drugs, trafficking and traffic offences such as driving with no insurance

Where do we get the information?

- Police
- TFS
- Europol/Interpol
- CPS/Fiscal FOI request for individuals who have been prosecuted for different offences who have entered 'haulier' as occupation.

9. How much confidence can be placed in the accuracy of collected data on the haulage of waste?

As we have already discussed there is very little confidence to be placed on the accuracy of information as the vast majority is provided by the haulier themselves and we as regulators rely on their honesty, but do not understand the industry well enough to challenge the validity of said information. However, this information can be used as a starting point/indication before interrogating the data. Standardising the data that we receive may go some way in improving our confidence on the data

Where do we get the information?

- Hauliers – Post arrest interviews

- Regulators
- Local Authorities

10. Does the current collaboration between relevant agencies provide effective detection of criminal activity within this industry?

We acknowledged the fact that there is a distinct lack of intelligence being shared between organisations which should be a matter of course.

Where do we get the information?

- GAIN/WASPI (Government Agencies Intelligence Network and Wales Accord for Sharing Personal Information) for Wales
- Gartcosh – Issue a report on who's been working collaboratively

Annex II – ‘Drive out waste crime’ leaflet (printed versions)

English (1)

Compliance is non-negotiable
When you comply with the permit and other legal requirements, you are doing the right thing. But compliance is not optional. If you are not compliant, you will be fined and your business may be closed down. It is your responsibility to ensure you are compliant with the law. If you are not compliant, you will be fined and your business may be closed down. It is your responsibility to ensure you are compliant with the law.

Contact SEPA
The Scottish Environment Protection Agency (SEPA) is the national authority for environmental protection in Scotland. If you need advice or guidance, we will work with you to ensure that you are compliant with the law. We can help you with:

- Understanding the law
- Applying for a permit
- Understanding the consequences of non-compliance

DRIVE OUT WASTE CRIME

SMART
The LFE 2015/16 Waste and LFE 2015/16 Waste Management, locally SEPA, is an important part of the Scottish Government's strategy for Scotland. The program has been made possible with the support of the LFE 2015/16 Waste and LFE 2015/16 Waste Management.

English (2)

Waste crime alert!
Waste crime is a criminal offence. It is a crime to dispose of waste in an unauthorised way. If you are caught, you could be fined or go to prison. It is your responsibility to ensure you are compliant with the law. If you are not compliant, you will be fined and your business may be closed down. It is your responsibility to ensure you are compliant with the law.

Haulier Duty of Care
Hauliers have a responsibility to ensure that the waste they are transporting is disposed of in an authorised way. If you are caught, you could be fined or go to prison. It is your responsibility to ensure you are compliant with the law. If you are not compliant, you will be fined and your business may be closed down. It is your responsibility to ensure you are compliant with the law.

Help us drive out waste crime
When reporting waste crime, please ensure that you provide as much information as possible. This will help us to identify the offender and take action. Always check the address for the offender. Help us to protect our environment by being a 'Waste Crime Reporter'.

Failure to obey the law could cost you your operating licence, up to £40,000 and a jail sentence

Polish (1)

Przestrzeganie przepisów nie podlega negocjacji
Kiedy przestrzegasz przepisy, robisz to dobrze. Ale przestrzeganie przepisów nie jest opcją. Jeśli nie przestrzegasz, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów. Jeśli nie przestrzegasz, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów.

Skontaktuj się z SEPA
Wojewódzki Urząd Ochrony Środowiska (WUOS) jest krajowym organem nadzoru nad przestrzeganiem przepisów w dziedzinie ochrony środowiska. Jeśli potrzebujesz pomocy lub porady, będziemy współpracować z Tobą, aby upewnić się, że przestrzegasz przepisów. Możemy pomóc Ci z:

- Zrozumieniem przepisów
- Złożeniem wniosku o pozwolenie
- Zrozumieniem skutków niezastosowania się do przepisów

WYELIMINUJ PRZESTĘPCZOŚĆ ZWIĄZANĄ Z ODPADAMI

SMART
Plan gospodarki odpadami województwa łódzkiego (PGO) jest ważnym elementem strategii województwa łódzkiego. Program został umożliwiony dzięki wsparciu z Planu Gospodarki Odpadami Województwa Łódzkiego (PGO).

Polish (2)

Groźne skutki przestępstw związanych z odpadami
Przestępstwa związane z odpadami to przestępstwa. To przestępstwo jest przestępstwem. Jeśli jesteś złapani, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów. Jeśli nie przestrzegasz, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów.

Obowiązek dozowania najeźdźców przez przewoźników
Przewoźnicy mają obowiązek upewnić się, że odpady, które transportują, są odpowiednio oznaczone i zabezpieczone. Jeśli nie przestrzegasz, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów. Jeśli nie przestrzegasz, możesz być ukarany i twoja firma może zostać zamknięta. To twoja odpowiedzialność, aby upewnić się, że przestrzegasz przepisów.

Pomoc nam wyeliminować przestępstwa związane z odpadami
Kiedy zgłaszasz przestępstwo, prosimy, abyś podał jak najwięcej informacji. To pomoże nam zidentyfikować sprawcę i podjąć działania. Zawsze sprawdzaj adres. Pomoc nam wyeliminować przestępstwa związane z odpadami. Kiedy zgłaszasz przestępstwo, prosimy, abyś podał jak najwięcej informacji. To pomoże nam zidentyfikować sprawcę i podjąć działania. Zawsze sprawdzaj adres. Pomoc nam wyeliminować przestępstwa związane z odpadami.

Niezastosowanie się do przepisów może wiązać się z utratą licencji, grzywną do 40 000 zł i karą pozbawienia wolności

Romanian (1)

Respectarea regulilor nu este negociabilă
Când respectezi regulile, faci asta bine. Dar respectarea regulilor nu este opțională. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile.

Contactați SEPA
Agenția Națională de Protecția Mediului (ANPM) este autoritatea națională responsabilă pentru protecția mediului în România. Dacă ai nevoie de sfaturi sau informații, vom lucra împreună pentru a te asigura că respectezi regulile. Putem să te ajutăm cu:

- Înțelegerea legilor
- Cererea unei licențe
- Înțelegerea consecințelor neconformității

ELIMINAȚI INFRAȚIUNILE ÎN MATERIE DE DEȘURI

SMART
Planul Național de Gospodărire a Deșeurilor (PNGD) este o parte importantă a strategiei naționale de gestionare a deșeurilor. Programul a fost posibil datorită sprijinului din partea Planului Național de Gospodărire a Deșeurilor (PNGD).

Romanian (2)

Prevenirea pericolului de incendiu în depozitul de deșuri
Incendiile în depozitele de deșuri pot fi prevenite prin aplicarea măsurilor de precauție adecvate. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile.

Dăruirea de informații
Când raportezi o infracțiune, te rugăm să furnizezi cât mai multe informații. Acest lucru ne va ajuta să identificăm infractorul și să luăm acțiune. Verifică adresa. Dăruirea de informații. Când raportezi o infracțiune, te rugăm să furnizezi cât mai multe informații. Acest lucru ne va ajuta să identificăm infractorul și să luăm acțiune. Verifică adresa.

Obținerea de informații
Transporteurii au obligația de a asigura că deșeurile sunt transportate în mod corespunzător și sunt etichetate corect. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile. Dacă nu respectezi, poți fi amendat și firma ta poate fi închisă. Este responsabilitatea ta să te asiguri că respectezi regulile.

Respectarea legii vă poate costa licența de operare, până la 40 000 de lire sterline și pedeapsă cu închisoarea

Lithuanian (1)

Taisykių laikymasis nediskutuotinas
Kada laikosi taisyklių, daro tai gerai. Tačiau laikymasis taisyklėmis nėra neapgalvotas. Jei ne laikosi, gali būti bauda ir uždarytas verslas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių. Jei ne laikosi, gali būti bauda ir uždarytas verslas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių.

Susisiekite su SEPA
Valstybinė aplinkosaugos tarnyba (SEPA) yra nacionalinė institucija, atsakinga už aplinkosaugos apsaugą Lietuvoje. Jei reikia pagalbos ar patarimų, mes dirbame su jumis, kad užtikrintume, kad laikotės taisyklių. Galime padėti su:

- Taisyklių supažindinimu
- Licenzijos paraiškimu
- Taisyklių pažeidimų pasekmėmis

IŠVENKIME SU ATLIEKOMIS SUSIJUSIU PAZĖDIMŲ

SMART
Lietuvos Respublikos atliekų tvarkymo planas (LRATP) yra svarbi dalis nacionalinės atliekų tvarkymo strategijos. Programą įgyvendinti padėjo Lietuvos Respublikos atliekų tvarkymo planas (LRATP).

Lithuanian (2)

Įspėjimas dėl su atliekomis susijusių pavojų
Su atliekomis susiję pavojai gali būti išvengti, jei laikotės taisyklių. Jei ne laikotės, galite būti baudami ir jūsų verslas gali būti uždarytas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių. Jei ne laikotės, galite būti baudami ir jūsų verslas gali būti uždarytas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių.

Išvengti pavojų
Kada atliekas transportuojate, turite užtikrinti, kad atliekos būtų tinkamai apibūdinamos ir saugomos. Jei ne laikotės, galite būti baudami ir jūsų verslas gali būti uždarytas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių. Jei ne laikotės, galite būti baudami ir jūsų verslas gali būti uždarytas. Tai yra atsakomybė užtikrinti, kad laikotės taisyklių.

Pagalba mums išvengti su atliekomis susijusių pavojų
Kada pranešate apie pažeidimą, prašome pateikti kuo daugiau informacijos. Tai padės mums nustatyti pažeidimą ir imtis veiksmų. Visada patikrinkite adresą. Pagalba mums išvengti su atliekomis susijusių pavojų. Kada pranešate apie pažeidimą, prašome pateikti kuo daugiau informacijos. Tai padės mums nustatyti pažeidimą ir imtis veiksmų. Visada patikrinkite adresą.

Jei neatliksite įstatymų, galite prarasti vežimo licenciją, gauti iki 40 000 eurų atlyginimo baudą ir įkalinimą

Annex III – Media coverage for ‘Drive out waste crime’ campaign

Table 5 – ‘Drive out waste crime’ campaign media coverage

Date	Media outlet	Headline / summary	Media
04/10/2018 [07:36:44, 4m 4s]	BBC Radio Scotland	The Scottish Environment Protection Agency and Police Scotland have announced a joint effort to tackle cross-border waste dumping ...	Radio
04/10/2018 [13:03:35, 31s]	BBC Radio Cumbria	Waste in large quantities is being dumped illegally just over the border in Scotland. Includes interview with Kath McDowell of SEPA ...	Radio
04/10/2018 [07:10:44, 36s]	STV Central East	Illegal cross-border waste haulage and disposal is the target of a new campaign led by the Scottish Environment Protection Agency. Includes interview with Kath McDowell.	Radio
04/10/2018 [06:01:27]	West Sound Radio	A campaign has been launched to put a halt to cross-border waste dumping. Includes interview with Kath McDowell of SEPA.	Radio
04/10/2018 [07:10:44]	STV Central East	Illegal cross-border waste haulage and disposal is the target of a new campaign led by the Scottish Environment Protection Agency. Includes interview with Kath McDowell.	Radio
04/10/2018 [13:03:25, 33s]	West Sound Radio	A major crackdown on English hauliers dumping rubbish in Scotland has begun. Includes interview with Kath McDowell of SEPA ...	Radio
04/10/2018 [13:01:32, 46s]	CFM Radio (1)	Environmental workers have got together in both England and Scotland to target illegal waste haulage and disposal. Includes interview with Kath McDowell of SEPA ...	Radio
04/10/2018 [09:02:27, 35s]	Radio Borders (1)	A campaign has been launched to stop the rise of fly-tipping around the borders. Includes interview with Kath McDowell of SEPA ...	Radio
04/10/2018 [06:31:37, 11s]	Radio Borders (2)	A campaign has been launched to stop the rise of fly-tipping around the borders. The Scottish Environment Protection Agency is working with police to warn organised crime gangs are often involved ...	Radio
04/10/2018	STV News	Illegal cross border dumping targeted in £3.8m crackdown	Online
04/10/2018	BBC News (Scotland)	Cross-border waste dumpers targeted Roadside stops have been held at Gretna as part of efforts to tackle waste being illegally brought across the border and dumped in Scotland. Includes comment from Kath McDowall, unit manager at Sepa's waste crime investigations team.	Online
04/10/2018	Daily Mail	£3.8m crackdown planned on illegal cross-border dumping	Online
04/10/2018	AOL UK	£3.8m crackdown planned on illegal cross-border dumping. <i>[Note: this story originated from PA and appeared across approximately 110 newspaper websites.]</i>	Online
04/10/2018	The Herald	Road stops in waste purge (p4 News): ROAD stops are being carried out on hauliers in a crackdown on illegal dumping in Scotland. Hauliers travelling from across the UK are among those believed to be responsible, the Scottish Environment Protection Agency (Sepa) said	Press - UK Regional

Date	Media outlet	Headline / summary	Media
08/10/2018	The Berwickshire News	Cross-border hauliers using the A1 targeted	Online
04/10/2018	Border Telegraph	Agencies team up to stop region becoming a cross-border dumping ground	Online
12/10/2018	Berwick Advertiser	Clampdown on waste crime	Online
04/10/2018	West Sound	New campaign to drive out cross border waste crime	Online
10/10/2018	InsideMoray	New partnership to tackle rural crime	Online
04/10/2018	The Scotsman	Road stops catch out illegal dumpers (p2 News): Road stops are being carried out as part of a new crackdown on illegal dumping in Scotland. Hauliers travelling from across the UK are among those believed to be responsible, the Scottish Environment Protection Agency (Sepa) said.	Press - UK Regional
05/10/2018	Dumfries & Galloway Standard	Blitz launched on waste crime [p10 News. Sharon Liptrott] A crackdown has been launched on cross-border crooks who illegally dump waste in the region. Includes comment from Kath McDowall of SEPA's waste crime investigations team.	Press - UK Regional
05/10/2018	Greenock Telegraph	ILLEGAL CROSS-BORDER DUMPING CRACKDOWN LAUNCHED [p19 News] ROAD stops are being carried out as part of a new crackdown on illegal dumping in Scotland. Includes comment from Kath McDowall, Unit Manager (SEPA)	Press - UK Regional
05/10/2018	Peeblesshire News	Cross-border dumping ground fears for region [p9 News. David Knox] ENFORCEMENT agencies have joined forces in a bid to stop the Scottish Borders and other rural parts of Scotland being used as a cross-border dumping ground. Includes comment from Kath McDowall of SEPA's Waste Crime Investigations Team.	Press - UK Regional
23/10/2018	Commercial Motor	SEPA clamps down on illegal waste haulage	Trade / online
October 2018	Translogistics (UK)	SEPA Joins Forces With UK Agency & Industry Partners To Drive Out Waste Crime	Trade / online
04/10/2018	CIWM Journal	SEPA Joins Forces With UK Agency & Industry Partners To Drive Out Waste Crime	Trade / online
04/10/2018	Resource	UK environment agencies focus on waste crime across borders [Kate Dickinson]	Trade / online
04/10/2018	Letsrecycle.com	SEPA leads fight against illegal waste haulage	Trade / online
04/10/2018	Insider.co.uk	SEPA in crackdown on illegal waste disposal and metal crime	Trade / online
04/10/2018	MRW.co.uk	Scotland takes lead on illegal cross-border dumping	Trade / online
08/10/2018	Envirotec Magazine	SEPA joins forces with UK agency and industry partners in bid to tackle waste crime	Trade / online
01/12/2018	Skip Hire & Waste Magazine	Unaware haulage firms could be liable if caught transporting illegal waste – SEPA	Trade / online

Unaware haulage firms could be liable if caught transporting illegal waste – SEPA

LIFE SMART Waste, a European-funded project lead by Scottish Environment Protection Agency (SEPA), is partnering with organisations and law enforcement to halt rogue operators illegally dumping waste throughout the UK, particularly in Scotland.

Based on intelligence, the project is tackling illegal transportation of waste dumped throughout the UK, sometimes under the guise of being warehoused in unregulated units.

The decision to target the threat posed by waste transportation recognised most illegal waste sites receive waste transported by road.

Kath McDowell, Unit Manager for SEPA's waste crime investigation team, said: "Eunomia estimated waste crimes cost the UK economy over £600 million per year. We're working with partners to prevent waste from illicitly being brought from England and Wales and illegally disposed of in Scotland."

Illegal dumping can result in environmental damage, social disruption, pollution, pest infestation, fires, and disruption to daily lives.

Liability for prosecution (sub heading)

The issue can also affect businesses too. Haulage firms may be exploited by criminals to transport waste to illegal disposal sites and these hauliers may not realise they are committing offences that could leave them liable to fines, prosecution and operational sanctions. To tackle the issue, SEPA is collaborating with agencies including cross-party Environmental Agencies, Police Scotland, British Transport Police, DVSA, Office of the Traffic Commissioner and among others. Robin Rofe, Waste Intelligence Officer for LIFE SMART Waste, said: "These 'waste criminals' undertake illegal fly-tipping on an industrial scale for short-term financial gain. They may not set out to harm the environment, but in their single-minded pursuit of profit waste criminals completely disregard environmental protection laws. "Criminals believe they can escape the law by crossing the border into another jurisdiction, but SEPA stress through working alongside multi-agency partners and sharing intelligence across boundaries, this threat can be addressed."

Waste criminals operate throughout the



country, offering cheap waste removal, but then dumping it in empty warehouses, quarries, fields or farm buildings. Typically, this waste consists of materials that would be otherwise difficult to process or recycle and would possibly go to landfill, which normally incurs tax.

Moving forward, SEPA want to form a Trade Group of experts within the waste industry, which would meet four times a year to discuss waste crime, its effects on the waste industry and how to eliminate it. The organisation also urges members of the public that notice any suspicious waste dumping activity at sites near them to contact SEPA on: 03000 996699.

DRIVE OUT



WASTE CRIME

Failure to comply with waste regulations and **Duty of Care** legislation could cost hauliers their operating licence, up to £40,000 and a jail sentence.

Find out more:
www.netregs.org.uk/environmental-topics/waste



Annex V – SEPA digital media activity

Table 6 - SEPA digital media activity

Description / link	Issue date	Reach	Engagement*
LSW web news - Project online news article	04/10/2018	N/A	N/A
SEPA Media centre - online News release	04/10/2018	166 users	309 page views
YouTube - Multi-agency action video	04/10/2018	259 impressions	140
YouTube - Campaign video	10/10/2018	170 impressions	39
Twitter - Link to BBC News coverage	04/10/2018	6,012 impressions	105
Twitter - Link to STV news coverage	04/10/2018	4,983 impressions	96
Twitter - Link to Daily Mail coverage	04/10/2018	2,866 impressions	71
Twitter - Link to MRW article	04/10/2018	4,357 impressions	39
Twitter - Multi-agency action	04/10/2018	15,073 impressions	167
FaceBook - Multi-agency action	04/10/2018	4,481 impressions	183
LinkedIn - Multi-agency action	04/10/2018	1,803 impressions	78
SEPA Update – E-newsletter news feature	05/10/2018	3,066 recipients	829 opened
LinkedIn - 'Drive out waste crime'	24/10/2018	2,437 impressions	67
NetRegs Twitter – Multi-agency action	04/10/2018	N/A	N/A
NetRegs news feature	30/10/2018	4,604 recipients	1,103 opened
NetRegs NI news feature	30/10/2018	1,761 recipients	373 opened
	TOTAL	52,038	3,599
* Total number of post clicks, shares, likes, etc.			

Annex VI – Partner digital media activity

Table 7 - Partner digital media

Partner	Issue date	Link	Description
Road Haulage Association	Oct 2018	RHA.uk.net	'Drive out waste crime' information leaflet – English version (PDF)
Road Haulage Association	Oct 2018	Online	RHA Roadway Live article: 'SEPA Crackdown on Illegal Waste'
Road Haulage Association		Twitter	Driving out waste crime: RHA proud to support @ScottishEPA initiative. Illegal dumping harms the environment, causes misery and costs UK economy £600m a year. More on #RoadwayLive http://bit.ly/2O5HmbV #WasteCrime
Police Scotland	05/10/2018	Scotland.police.uk	Pictorial feature in Weekly News Roundup: 'Police Scotland has joined forces with the Scottish EPA to help fight against waste crime.'
Police Scotland	04/10/2018	Twitter	@ScottishEPA joins forces with UK agency & industry partners to drive out waste crime. The Drive out waste crime initiative involves a series of road stops & site visits to remind hauliers of their responsibilities relating to waste haulage & disposal: http://media.sepa.org.uk/media-releases/2018/sepa-joins-forces-with-uk-agency-and-industry-partners-to-drive-out-waste-crime/...
Scottish Police Federation	12/10/2018	Spf.org.uk	Web article: 'Clampdown on waste crime'
Environment Agency (NW)	04/10/2018	Twitter	Yesterday our officers joined colleagues from @ScottishEPA and @PoliceScotland to target illegal cross border dumping in £3.8m crackdown #WasteCrime #Cumbria http://ow.ly/HM6h30m5RHW
Environment Agency (NE)	04/10/2018	Twitter	Our teams joined forces with @ScottishEPA to carry out stop checks on the A1 targeting cross border #waste dumping in a multi-million pound crackdown. Read more: https://stv.tv/news/scotland/1431549-illegal-cross-border-dumping-targeted-in-3-8m-crackdown/...
SBRC	04/10/2018	Twitter	Illegal cross border dumping targeted in £3.8m crackdown by @ScottishEPA and @policescotland . Read more: https://bit.ly/2ycb98c #wastecrime
Net Regs	04/10/2018	Twitter	@ScottishEPA joins forces with UK agency and industry partners to drive out waste crime #OnePlanetProsperity #WasteCrime #ScotRes18
ACR+	08/10/2018	Acrplus.org news	LIFE SMART Waste UK environment agencies focus on waste crime across borders
ACR+	08/10/2018	E-newsletter	LIFE SMART Waste UK environment agencies focus on waste crime across borders
ACR+	08/10/2018	Twitter	The #LIFESmartWaste led to a multi-agency action by #UK #environment agencies targeting cross border illegal dumping and related #waste crime. Learn more about the "Drive out waste crime" campaign: https://www.sepa.org.uk/regulations/waste/life-smart-waste/news-and-events/2018_waste-hauliers/
ACR+	08/10/2018	LinkedIn	The #LIFESmartWaste led to a multi-agency action by #UK #environment agencies targeting cross border illegal dumping and related #waste crime. Learn more about the "Drive out waste crime" campaign: https://lnkd.in/g2sHxu3

Annex VII – Problem Statement, March 2018

PROBLEM STATEMENT HAULIERS	
Details	
Name of Expert Group	Hauliers Intervention Group
Facilitator	Name: Iain Wright (SEPA) Email: iain.wright@sepa.org.uk Telephone: 01786 452520
Start Date:	26 March 2018
End Date:	
Analysis - Inputs	
Outputs from Steps 1 and 2	
Description of problem	<p>Waste is hauled from the point of production to the point of warehousing/disposal. This may be illegal waste hauled by legal hauliers or legal waste being hauled by illegal hauliers.</p> <p>From an insurance perspective, the haulage is not illegal, the disposal is therefore action needs to be taken at the root cause.</p> <p>Before designing a bundle of interventions, we need a definition of the 'Hauliers' involved. Is it Articulated Lorries or small scale unlicensed vans under 3.5tonnes?</p> <p>The public at times only see a bargain, they do not appreciate the potential environmental and financial impact of a cheap deal.</p> <p>No one agency has oversight of hauliers, OTC has oversight of Operators licences but vehicles of less than 3.5 tonnes are not included, therefore 'white van' and skip haulage are not controlled by one agency.</p> <p>There is sense that no action is taken as the question is too big and there is no current intelligence on the scale, scope, geographic location and demographic of problem.</p>
Analysis – Outputs	
Objectives	'Reduce hauliers involvement in illegal movements of waste' reduce the impact of illegal carriage of waste in the sector
Targets	Yet to be ascertained, but likely to be the public, haulage industry and hauliers who use vehicles weighing less than 3.5 tonnes.
Resources and barriers	
Outputs from Step 5	
Enablers	Expert Group can all come together and take action in a cohesive and structured campaign There is a need to deal with the illegal dumping of waste which is hauled to its destination
Barriers	No one organisation has regulatory oversight of hauliers There is no current evidence based intelligence product to base any bundle of interventions on
Recommendations for solution	
Continue meetings of Expert Group Develop current evidence based intelligence product upon which to base any design of Intervention Bundle.	
Possible interventions	Education/publicity campaign Enforcement campaign details to be confirmed on receipt of intelligence product Others to be confirmed
Possible delivery bodies	To be confirmed
Requirements for further information/intelligence	Current evidenced intelligence product has to be made available before progress can be made in the design of Intervention Bundle.

Annex VIII – Minutes of Expert Group meetings

The Expert Group met on three occasions during March, August and October 2018:

Meeting 1: Waste Hauliers Expert Group (March)

Venue: SEPA, Angus Smith Building, Eurocentral, Holytown

Date: 26 March 2018

Attendees:

- Alasdair Anderson SEPA Chair
- Gillian Fowler SEPA Notes
- Iain Wright SEPA Facilitator
- Ian Bryson SEPA
- Jim Scott Scottish Business Resilience Centre/Scottish Fire and Rescue
- Stuart McLean Axa Insurance
- Michael Gaughan Police Scotland
- Richard Loftus Driver and Vehicle Standards Agency

Why Do Hauliers Pose a Problem for your organisation in relation to illegal waste transportation?

- The Expert Group concluded that waste is going somewhere, it has a start and end (disposal) point with hauliers moving it. Is the waste moved by legitimate hauliers, or a hired van?
- HGVs are mainly legitimate, some work outwith their regular hours for cash in hand but are still licensed; although they exceed their hours worked – most are licensed and legitimate – not all are parked up at the weekend.
- There has been a case with the Office of the Traffic Commissioner (OTC) where they revoked a licence for working excess hours.
- From an insurance perspective, the hauliers are not doing anything illegal until the waste is disposed of (if illegally), only the end point is illegal not the disposal.
- Before designing a bundle of interventions, we need a definition of the 'Hauliers' involved. Is it Articulated Lorries or small scale unlicensed vans under 3.5tonnes?
- Waste movements must have a waste transfer note to comply with duty of care, but they all say 'muck and stones' which is miss-classification of the waste; if this were discovered at a road stop SEPA would consider a report to the Procurator Fiscal (PF) as this is illegal although the vehicle is ok.
- There was a discussion around what is a criminal/civil breach? There may not be a road traffic offence but it's illegal to carry miss-classified waste.
- We do know Eire and NI are sending waste into sites in Scotland. There is no available intelligence that hauliers are bringing waste into the UK.
- Some members of Serious and Organised Crime Groups (SOCG) are known to infiltrate hauliers with operators licences.
- SEPA work with Police Scotland and other partners attending road checks in an effort to deal with waste crime at an operational level.

Why is illegal haulage of waste/haulage of illegal waste attractive to hauliers?

- Some operators get involved as they are motivated by greed. This activity is often not regarded as main stream criminality, and are 'only' environmental crimes.
- This activity is seen as low risk for high reward, and it's not a top priority for Police, it's below the radar and if caught the fines are low. The fees received for one illegal load will cover the fine.
- There is a need to work closely with the OTC etc. for multi-agency working. Report to OTC who can take up the case and revoke the licence but dependent on circumstances, this stops a criminal case and vice versa.

- Some operators were reported to the PF and OTC; and action was taken by both.
- There have been good disruptive results from impounding vehicles.
- Need to raise awareness of the public and operators to criminality in the haulage industry, and a need to inform partners of each partners remit and what their powers allow –basically an education programme which informs partners and the public/industry.
- There was a discussion around is the hauliers market/business good? Are they being greedy by getting involved in waste crime, just looking for another revenue stream? Conclusion was those involved in criminality by hauling waste illegally were being greedy as most of this work is paid cash in hand.
- At checkpoints, if operators are licensed and are carrying waste, Police etc wouldn't check waste only SEPA.

Who should we be tackling?

- The Expert Group concluded that we need to tackle hauliers but who does it..?
- The Expert Group agreed we need an intelligence product to act upon. There was also a robust discussion around where do we get this intelligence and from whom do we get it?

What are the barriers to tackling this?

- There was a discussion around the lack of knowledge in partner agencies, and whose priority are hauliers? It was concluded that no one agency is responsible for hauliers except where OTC has responsibility for Operators Licences.
- If the problem is made public through an education and publicity campaign, then the public can drive it especially if there is criminal involvement. There's also a lack of knowledge on waste. One example is tyres, they can be both waste and a product, this lack of knowledge could be an issue and responsibility lies with the partner agencies to educate each other.
- As an example, some local authority areas have a high rate of fly-tipping caused from vehicles weighing less than 3.5T vans. There's no regulatory oversight on these vehicles. They don't have to be owned, they can be hired, so if impounded they hire another with little disruption to their activities.
- It was also assessed there is a lack of staffing in the partner agencies which means activities require to be prioritised. This supports the need for a current, accurate intelligence product on which to design Interventions Bundles.
- International shipments from the UK can involve criminality and there is profit to be made, not specifically by hauliers but they could be involved. An intelligence product would support/refute this.
- Large scale fly tipping using vehicles weighing less than 3.5T are mainly cash in hand possibly have criminal involvement. They are more likely to be involved in misclassification of waste which results in tax avoidance, loss of revenue affecting local services and other implications.
- SOCGs and specific social groups have businesses in waste, but can also be multi-national companies who are involved in a high number of waste movements.
- There was a specific discussion around whether a campaign was necessary.
- It was generally agreed that a campaign or series of campaigns would be useful. One should be aimed at high level operators who deliberately misclassify waste and avoid paying tax.
- One should be aimed at vehicles weighing less than 3.5T vans who works for cash in hand and are more likely fly tip the waste; this is causing issues in many areas.
- It was agreed that there is criminal involvement in the haulage of waste. Big haulier companies are interested in the movement of drugs, guns and people from A to B and they make money from this. Smaller scale (less than 3.5 tonnes) operators gather up waste and fly tip it thus causing environmental issues and avoid associated costs and the country loses revenue.

- SEPA or any other agency need partners to tackle the illegal haulage of waste, but hauliers are of no interest to some partners. Hauliers do need to be tackled but is there a will to do so?
- The question ‘is there a problem with hauliers in Scotland..?’ was posed to the group. It was generally agreed that they do pose a problem, as waste must move from the point of production to the point of warehousing or disposal. The Expert Group also agreed that help is needed to tackle and stop waste deposits in warehouses and we need different ways to tackle the problem, perhaps including routine checks by all partners?
- There was a discussion around how do hauliers get the different types of waste that they move about? The Expert Group was of the opinion that an intelligence product should answer this and give a basis for designing bundles of interventions.
- They also agreed we need a campaign to highlight the issue, educate the public and industry before we move to enforcement. Hauliers with licences know full well what they can and can’t do, so they make the judgement to either get involved or not. It’s a mind-set some are greedy to make extra money. Others run their business by the book.

What Resources do we need to tackle this

- Following on from earlier discussions, the Expert Group needs to know the scale/scope of the issue and the types of wastes involved and to identify and rank where the problems are and prioritise them as well as who is behind illegal waste hauliers. More work needs done to show the scale of the uncollected tax and emphasise show the human impact.
- SEPA and other environment agencies enforcement assistance from partners as criminals are not scared of SEPA. Cutting out criminals to allow legitimate companies to flourish prevents an unfair market with reduced overheads.
- The Expert Group is of the opinion that a report needs to be produced to show this by providing substance to the argument to highlight to Scottish Government.
- **What partner agencies can assist us?**
- There is a need to move the hauliers agenda forward and a robust report would provide more evidence to Scottish Government. We need to speak to the hauliers, if legitimate businesses are losing out to criminal activity, or in greed to make more money they undercut legitimate industry, they may help. Revenue Scotland may be able to assist help with the financial aspect of tax evasion and lost revenue.
- Axa had access to the Association of British Insurers (ABI) who would possibly be supportive to have legitimate companies to insure.
- It was suggested useful if SEPA were to give a powerpoint presentation to partners to share on how to check waste and if waste carrier is legitimate.

Who’s best to lead?

- The Expert Group assessed that this was difficult to decide, as many partners are involved. The question was asked ‘ is SEPA best placed as they enforce the environmental regulations?’ No conclusion was drawn from this as we still need an intelligence product to assess the scale of the problem and who is involved before deciding who is best placed to lead.
- The point was made that there is no regulatory oversight for vehicles under 3.5T as no operator’s licence is required. The vehicle often doesn’t need to be bought just hired and other road traffic offences go with carrying waste.

Is our regulatory regime adequate to tackle this?

- The Expert Group came to the conclusion that no one organisation has regulatory oversight and that leads to all agencies contributing to this weakness.
- This is why an education of each partners’ role and powers should be provided to other partners. This might go some way to filling perceived gaps in oversight and regulation.

Does society encourage it?

- The Expert Group assessed that cheap is the first choice by the public as everyone wants a bargain price.
- There is a lack of knowledge, does the public need prosecuted to highlight that cheap prices go to criminal gangs, more importantly, do the public care?
- In respect of the illegal warehousing of waste, where there's an environmental/human impact there's a huge public outcry. Little public thought is given to letting companies flourishing at the detriment of the environment.
- Again the Expert Group assessed that an actionable intelligence product is required before acting on this.

What interventions would have an impact on hauliers getting involved in the illegal haulage/haulage of illegal waste?

- The Expert Group is of the opinion that any campaign should educate then enforce.
- Interventions depend on who you're dealing with. If hauliers are in it because of low risk for high gain, there needs a bigger impact on business such as losing a licence/insurance to stop the business.
- More waste carriers licences have been issued recently than in previous years this is in part due to education at road stops. Now most people stopped at road checks have a waste carriers licence, this is in direct contrast to a few years ago when the majority of people stopped did not have waste carriers licences.
- The education/publicity campaign needs to show the environmental impact and the levels of water/ground contamination.

What should our objective be and what should it realistically seek to achieve?

- 'Reduce hauliers involvement in illegal movements of waste'
 - reduce the impact of illegal carriage of waste in the sector
- The bundle of interventions should educate the public on the transport of waste.
- Hauliers is a huge problem to tackle, and the bundle of interventions needs to highlight the issues. One example of education is a page on SEPA's website. It should also educate the industry so they are will/be breaking the law and will know the consequences ie licences can be lost.
- Any bundle of interventions needs partners and their powers to be effective.
- Education of the public also needed; some public will comply. If a deal looks too good to be true, then it probably is.

What other/more intelligence do we need?

- Before designing the bundle of interventions we need to
 - identify the scope of the problem
 - identify the scale of the problem
 - identify who is involved
 - identify where it is happening
 - identify how it is happening
- A current accurate evidenced intelligence product would provide a robust decision making base.

Meeting 2: Waste Hauliers Expert Group (August)

Date: 22 August 2018

Attendees:

- Richard Loftus – DVSA
- Stewart Hurry – Scottish Business Resilience Centre (SBRC)
- James Scott – Scottish Business Resilience Centre (SBRC)
- Arlene Wilson – British Transport Police (BTP)
- Chris Little – Road Haulage Association (RHA)
- Farah Ijaz – HMRC
- Audrey Dick – Office of the Traffic Commissioner (OTC)
- Archie Rowatt – SEPA
- Alasdair Anderson - SEPA
- Iain Brockie – Life SMART Waste Project - SEPA
- Robin Rofe – Life SMART Waste Project – SEPA
- Iain Wright – Life SMART Waste Project – SEPA
- Margaret Gay – Life SMART Waste Project - SEPA

Aim

To identify:

- What interventions should take place in respect of hauliers?
- Who will deliver these?

Intelligence Picture

The current intelligence picture in relation to the involvement of hauliers in the waste industry was discussed – please refer to the intelligence report produced by the LSW team. The main points featured in this report are as follows:

- Cross-border illegal dumping in Scotland
- Types of vehicles – 40ft articulated lorries
- Drivers – UK / Polish / Lithuanian / Romanian nationals
- Types of waste transported – RDF / baled waste
- Financial incentive to hauliers
- Sources of waste include
 - Liverpool
 - Manchester
 - Sheffield
 - Hull
 - Middlesborough
 - Hartlepool
 - Sunderland
- Travelling north into Scotland via Dumfries and Galloway area
- Either 1 or 2 trips per day north by drivers
- Recruitment of hauliers – internet sites/word of mouth/local haulage companies

Outcomes

- Interventions will focus on vehicles over 3.5 tonnes (travelling from England or Wales to Scotland) and other large vehicles that can transport waste.
- Interventions will focus on the haulage companies and not the drivers.
- Interventions will include operational, high visibility activity i.e. road stops. Road stops action should be intelligence led.

- Interventions should include an educational awareness campaign prior to any enforcement action, which should include:
 - Distribution of written material via Stuart Hurry, SBRC, to working group in September.
 - Potential input to the CTC qualifications course via Office of the Traffic Commissioner – Audrey Dick will confirm with Ms Aitken if this can be progressed.
 - Distribution of educational leaflet via Chris Little, RHA.
 - Awareness leaflet in different languages (selected according to intelligence e.g. Polish, Romanian, Lithuanian) distributed at various service stations northbound (to coincide with routes north, based on intelligence).
 - Educational material to law enforcement, particularly road policing officers to highlight the issues.
- The interventions bundle will be trialled in Scotland and the UK and used as a baseline for future work in Europe.
- It was also identified that there is a need to continue to gather and develop intelligence related to the current intelligence picture detailed in the intelligence report.

Actions

- Iain Wright to amend problem statement to target vehicles over 3.5 tonnes.
- Iain Wright to arrange written material to be distributed through various partners (see above outcomes).
- Iain Wright and Robin Rofe to explore the use of an App to help identify hauliers at road stops – meeting with Richard Loftus.
- Iain Wright to liaise with Chris Little to explore a separate industry meeting with representatives identified by Chris.
- Mags Gay to update NRW on outcomes of Expert Group Meeting.
- Stuart Hurry to liaise with Iain Wright in relation to contacts with the Royal Sun Alliance insurance company.
- Iain Wright to discuss with various insurance companies the potential for action by them in relation to refusing insurance on vehicles with no tracker installed.
- Iain Wright to liaise with EA and NRW to collaborate on road stops action.
- The Expert Group should discuss with Border Force if they want to collaborate on this work.

Life SMART Waste Project Recommendations

The group acknowledged that the following recommendations should be proposed through the LSW Project:

- Prepare a paper in relation to appropriate criteria for applying for a waste carriers licence. The Expert Group should collaborate (via email) to identify said criteria.
- Use of Fixed Monetary Penalties (FMPs) on non-compliant operators.
- Proposal for SEPA to suspend operating licences of non-compliant/illegal operators until outcome of any prosecution trial.

Collaborative Partners

The group agreed that the following additional partner agencies should be able to provide some assistance with this work:

- Police
- Local authorities
- DWP
- Border Force
- Health & Safety Executive

- Scottish Government

Interventions Lead

- It was agreed by the group that SEPA would be the lead agency for this interventions work.

Next Steps

- Arrange road stops in meantime and continue with other recommendations
- Arrange further meeting of Expert Group following operational level activity to monitor overall progress and assess further deployable interventions.

Meeting 3: Waste Hauliers Expert Group (October)

Venue: SEPA, Angus Smith Building, Eurocentral, Holytown

Date: 26 March 2018

Attendees:

- Keith Hunter – Office of the Traffic Commissioner (OTC)
- Archie Rowatt – SEPA
- Douglas Bell – British Transport Police (BTP)
- Craig McDonald – Police Scotland (Road Policing)
- Pauline White – Zurich Insurance
- George Edwards – HMRC
- Farah Ijaz – HMRC
- James Scott – Scottish Business Resilience Centre (SBRC)
- Stewart Hurry – Scottish Business Resilience Centre (SBRC)
- Chris Little – Road Haulage Association (RHA)
- Gillian Fowler – Life SMART Waste Project - SEPA
- Stuart McLean – AXA Insurance
- Frank McCann – Life SMART Waste Project – SEPA
- Margaret Gay – Life SMART Waste Project – SEPA
- Robin Rofe – Life SMART Waste Project – SEPA
- Ian Bryson – Life SMART Waste Project - SEPA
- Iain Wright – Life SMART Waste Project - SEPA

Aim

To discuss recent interventions action taken by partner agencies as a result of the previous expert working group, which took place on 22nd August 2018.

Introductions

The meeting was opened and chaired by Iain Wright, SEPA, and introductions were made around the room.

A brief review of the previous meeting took place for those that were unable to attend in August.

Discussion

A summary of the previous meeting's actions was run through and updates for each were given. The majority of the actions have been completed, however, the following are still ongoing:

- Development of App by Life Smart Waste/SEPA
- Potential input to the Driver CPC (Certificate of Professional Competence) New Operators Seminar

Recommendations made at the previous meeting (see Minutes from 22/08/2018) were updated:

- Paper on appropriate criteria for applying for waste carriers licence – work for this has yet to commence.
- Use of FMPs – this is currently on hold.

An overview of the previous intelligence, which drove the interventions action, was given. An update on intelligence submissions since the operational action was given by SEPA and NRW – this has been very limited to date, however, it is anticipated that given time this will improve as a result of the ongoing media strategy.

A review of the interventions action was discussed, which included the following:

- In Scotland, 38 lorries were stopped during the operational action. It was acknowledged that due to the good work of Police Scotland, the vehicles involved fitted the profile of the intelligence product perfectly.
- In Wales, approximately 197 vehicles were stopped during the operational action. Further details are awaited in relation to the media coverage in Wales in relation to this activity.
- Leaflets distributed via RHA and other partners.
- BTP gave a brief summary of the results of their overarching Operation MODE which incorporated the hauliers intervention work. They further expressed the value of the multiagency activity and how it has been extremely worthwhile.
- Communications strategy – Ian Bryson, gave a detailed update on the media campaign surrounding this action and confirmed that the social media activity is still ongoing.
- In furtherance of the communications strategy, some of the attending partners expressed a difficulty in identifying whether their organisation had taken advantage of, or benefitted from, the educational material. Stuart McLean mentioned that AXA Insurance have risk advice documents that could possibly incorporate the material but this would have to be explored further.

All agreed that the interventions action that took place has resulted in a good platform for future work.

Robin Rofe, gave an update on his engagement with the Trade Associations and their approach to waste crime now and in the future. The Trade Associations are keen to begin meetings (possibly November 2018) with appropriate partners to discuss the aforementioned approach as they are very keen to stop waste crime in the hauliers industry.

Discussion also took place around insurance information that could be checked at the roadside whilst road stops are ongoing. This is an option that will be explored with the Motor Insurers Bureau (MIB).

Outcomes

The following points came out of the various discussions during the course of the meeting:

- BTP have made application to the Scottish Government in relation to funding for an App – this is still ongoing, however, may be worth further discussion/investigation by the LSW team who are progressing the use of an App for future waste crime work.
- In relation to who else should the group engage with, Police Scotland may be considering a future project tackling illegal activity of smaller sized goods vehicles.
- It was suggested that one of the options for further funding for developing future projects could
- be explored through Universities, e.g. MSc/PhD applicants who are eligible to apply for funding.
- In relation to what further interventions would have an impact, the following suggestions were posited:

- For prosecution cases of environmental offences, an additional option would be to include evidence of organised crime charges. This will be explored by Frank McCann and is included below as an Action from this meeting.
- Suspension of environmental licences/permits was again suggested, however, this was already discussed at the previous meeting (August 2018) and requires no further action at this time.
- Lobbying Government if and where appropriate.
- Robin Rofe is continuing to engage with Scotland Excel in relation to raising the tendering criteria to ensure waste crime does not enter the procurement process. Emily at NRW raised reservations in relation to this area of intervention, specifically around legitimate businesses being prevented from making a living.
- The discussion point of “what further interventions would have an impact” will continue as an Agenda item for further meetings.

Actions

- Ian Bryson, SEPA, to forward social media links to Pauline White, Zurich Insurance.
- OTC to progress potential of including educational awareness input to the CTC qualifications course.
- Explore with MIB (Motor Insurers Bureau) the possibilities of insurance checks at future road stops.
- Frank McCann, SEPA, to liaise with Kath McDowall (SEPA’s Waste Crime Investigations Team Manager) and SEPA’s Legal Dept. re the addition of evidence of organised crime offences being added to environmental offences in the future.
- Further discussions to take place between Zurich and AXA Insurance companies with SBRC in relation to local authorities clearing of illegal dump sites and the insurance implications for this.
- Iain Wright to complete Interventions Report by end of 2018. On completion, appropriate member of LSW team to pursue opportunity to present and discuss recommendations with Scottish Government representatives.

Collaborative Partners

Pauline White suggested that the Public Affairs Team at Zurich Insurance could also get involved in this work. It was further suggested that the British Property Federation be approached for potential involvement in interventions work, where appropriate.

Other than the aforementioned, the group agreed that no additional partner agencies, other than those previously identified, were currently required to provide assistance in this particular area of interventions.

Interventions Lead

- It was agreed by the group that SEPA would continue to be the lead agency for this interventions work, for the time being.

Next Steps

- Continue activity for further road stops with Police Scotland.
- Progress the work surrounding the App.
- Progress development of potential Trade Advisory group.
- Iain Wright will progress completing Interventions Report with anticipated delivery date between November to December 2018.

Annex IX – Trade Advisory Group minutes, November 2018

SCOTTISH ENVIRONMENT PROTECTION AGENCY

**Smarter Regulation of Waste in Europe (LIFE13 ENV/UK/000549)
LIFE SMART Waste (LSW) Project
Action B15 Cross Agency Intervention Groups –
Legitimate Waste Trade Advisory Group
Hilton Hotel, Manchester Airport
21/11/2018 09:15 – 15:30**

Present:

Iain Wright (IW)	LSW Interventions Officer
Frank McCann (FM)	LSW Interventions Officer
Robin Rofe (RR)	LSW Interventions Officer
Adam Gallop (AG)	SEPA / LSW
Adrian Evans	LSW Interventions Officer
Simon Ellin (SE)	Recycling Association
Nick Fellows (NF)	Chartered Institute of Waste Management
Stuart McKenzie (SM)	Canal & River Trust
Tom Passmore (TP)	Dsposal
Jo Gallacher (JG)	Recycling & Waste World
Julia Turner (JT)	Wood Recyclers Association
Les Clayton (LC)	Waste Brokers Management Association

Apologies:

Stuart Foster (SF)	Recoup
Seamus Leheney (SL)	Freight Transport Association
Chris Little (CL)	Road Haulage Association
Jennifer Watts (JW)	United Resources Operators Consortium

Executive Summary of Actions		Owner
A001	Attendees of initial meeting to propose further members for approval by the initial attendees	All
A002	Identify what approaches work most effectively in combating criminal activities in other sectors (Procurement, counterfeit products, etc.) / countries that could be applied and developed to better identify, tackle and reduce waste crime in the UK	FM
A003	The collective strength of the group could produce agreed key messages (perhaps “3 steps” or something similar) which could be circulated by the group individually and collectively	RR
A004	Landlords would most benefit from practical guidance for property owners / landlords on how to safeguard themselves and others. This should be impactful, agreed by all key agencies to avoid confusion and would resonate more with intended recipients	RR
A005	Update the group on the progress of the proposed introduction of E-Docs	AE

A006	Produce practical guidance for the buyers and sellers of waste, producers and brokers, on how to safeguard themselves and others	RR
A007	Establish if there has been a successful prosecution in relation to Duty of Care and circulate details to members as a means of deterring those not complying with their obligations	AE

Post Meeting Update

Following the meeting, due to the information and advice provided by the LIFE SMART Waste Project team, immediate measures were taken by the Canal and River Trust to safeguard the movement and storage of waste on inland waterways. Bespoke guidance to be developed through the collaborative work of the group.

MINUTES:

Item No	Item	Action By & Log No.
1.	Welcome & Apologies	IW
1.1	IW welcomed everyone to the meeting. He explained that it was intended for attendees to have equal voices and that the format of the day would involve working through various aspects of themes outlined in a PowerPoint presentation throughout the day to agree if there was merit in forming a Legitimate Waste Trade Advisory Group comprising of key waste industry stakeholders, and if so, explore how it would function in the future	
1.2	Attendees confirmed that to the best of their knowledge such a collaborative group had not been convened in the UK before for this overarching purpose	
1.3	Attendees agreed that to increase openness of discussion, the group would operate under Chatham House Rule.	
2.	LSW Presentation	IW
2.1	IW provided a brief overview of the LSW project	
3.	Discussion Regarding the Meeting / Membership	
3.1	The group agreed that what was being done at present to tackle waste crime was not effective enough and that there would be mutual benefits from the creation of a group that could collaborate to develop interventions which will help the legitimate waste industry flourish.	
3.2	Attendees agreed that those invited to the initial meeting were appropriate members of the group; however proposed that further	

	<p>members should be suggested / approved by the attendees (Action 1) Suggestions included:</p> <ul style="list-style-type: none"> • Representatives from Small, Medium and Large companies • Waste Consultancy representation • Farmers / Famers Unions • Environmental Services Association • Smaller trade associations e.g. Tyres, Metals • Other UK environment agencies (e.g. Environment Agency and NIEA) 	A001 All
4.	Discussion Regarding Proposed Terms of Reference	
4.1	Key aspects of an initial Terms of Reference (ToR) for the group were discussed (Strategic Aim, Membership, Strategic Objectives and Purpose) and explained that further aspects name, background statement; composition and structure; appointment and key remit of chairperson; secretariat; etc.) would be a matter for the group.	A002 FM
4.2	SE raised the issue of KPIs and FM explained that this was for the group to decide and amend as appropriate; however, suggested that if the group achieved the various aspects of the purpose, outlined in the initial ToR, would be suitable indicators initially. In terms of the meeting, FM advised that initial success could be that there was an appetite to continue with, and develop, the group.	
4.3	The initial presentation mission statement, “Developing a Flourishing Legitimate Waste Industry” was agreed as an appropriate, positive statement that was of mutual relevance to attendees.	
4.4	Attendees agreed that “Legitimate Waste Trade Advisory Group” was an appropriate and positive title for the group.	
4.5	There was some discussion and agreement regarding current legislation in the UK being weak, with many loopholes exploited by criminals, undermining legitimate operators.	
4.6	Difficult for legitimate operators to understand legislation, complicated by difference between the four UK nations. Potential for ToR to include an examination of primary legislation.	
4.7	There was an appetite to identify what approaches work most effectively in combating criminal activities in other sectors (Procurement, counterfeit products, etc.) / countries that could be applied and developed to better identify, tackle and reduce waste crime in the UK (Action 2)	
4.8	Work of HMRC was highlighted – Conditionality. Should examine this initiative of aligning tax affairs with licence conditions. Potential for partnership working to bring greater scrutiny.	
5.	Discussion Regarding Warehousing	
5.1	NF pointed out that this adherence to B2 and B8 should deal with this. While there is a need not to stop legitimate trade, there should	

	be an addendum to B8. This may also act as a trigger for landlords to undertake more frequent inspections.	
5.2	There should be environmental insurance in place so that the renter cannot walk away – this should cover the “rammed to the rafters” cost of clear up.	
5.3	Main issue is the lies landlords are being told. Guidance for them on how to vet renters and indicators of rogue renters would be beneficial for carrying out due diligence / duty of care Current Duty of Care does not talk about landlords. This should be extended.	
5.4	The collective strength of the group could produce agreed guidance (perhaps “3 steps” or something similar). SE already has close links to the BBC and we could build on the work of the Watchdog program re extreme fly tipping (Action 3)	A003 RR
5.5	There could be a declaration included in licences / permits regarding non-involvement in waste crime	
5.6	Key recommendation: Industry would most benefit from practical guidance for property owners / landlords on how to safeguard themselves and others. This should be impactful, agreed by all key agencies to avoid confusion and would resonate more with intended recipients (Action 4)	A004 RR
6.	Discussion Regarding Brokerage	
6.1	Entry to the industry is very easy (no barriers). Limited on how much business entrants can generate. Broker companies need a credible governance framework to win contracts.	
6.2	Opportunity where rogue contractor / sites are discovered, efforts should be made to identify the waste broker.	
6.3	Unscrupulous brokers are likely to be complicit in mis-description of waste.	
6.4	LC highlighted that for brokers, reputation is everything. Rogue brokers present the greatest risk to legitimate brokers due to the reputation of brokers in general.	
6.5	Brokers don’t collaborate and are not really in competition with one another or stick to certain waste streams.	
6.6	LC suggested that brokers in the UK don’t get involved in plastics, RDF or SRF; however is unaware of the situation with regards to trans frontier shipments (TFS).	
6.7	There is a poor understanding of duty of care.	
6.8	NE suggested that if other areas were target hardened (such as landlords) this would adversely impact on rogue brokers.	
6.9	EWC codes could be used to identify different types off sites – confirming what goes in should confirm what comes out	

	Tracking waste data is currently impossible.	
6.10	There should be a means of accreditation (similar to Trust Pilot, trusted trader schemes, etc.). Companies with low ratings would be a flag to regulators.	
6.11	There should be better incentives for rogue operators to improve There is a need for data a transparency to know who brokers are, where they are, etc.	
6.12	TP advised on the development of a database utilising blockchain technology that regulators could have access to that would include data on weighbridge tickets, inspections, VGM weight requirements, Annex 7, inspection photos, etc.). This would be even more effective to regulators if it included E-Docs. Companies not participating should be a flag to the regulator.	
6.13	Key recommendations: Industry would most benefit from the introduction of E-Docs as a legislative requirement (mandatory use) - Group to be updated on progress (Action 5)	A005 AE
6.14	In the interim, and beyond the proposed introduction of E-Docs, industry would benefit from practical guidance for the buyers and sellers of waste, producers and brokers, on how to safeguard themselves and others (Action 6)	A006 RR
7.	Discussion Regarding Freight Forwarding	
7.1	Waste Carrier Licencing, Duty of Care and Trans Frontier Shipment are all relevant requirements to freight forwarders.	
7.2	Drivers may not be aware of the waste being carried This may be a declining problem as the UK will export less and potentially import more	
7.3	When in transit, freight can be redirected through the issue of a new Annex 7. The waste producer is likely to be unaware of the change in destination. Waste is normally diverted due to capacity issues and can be impounded at the original destination. Regulators in the UK may be unaware of the impoundment and subsequent diversion.	
7.4	Use of fraudulent paperwork to move unsuitable material is a problem. Unscrupulous brokers make money from the waste shipment and the PRN. Broker will disappear and avoid costs.	
7.5	There is a major loss of data for TFS – waste just disappears!	
7.6	Waste is left lying in ports because nobody knows where it came from. The originator of the waste doesn't know where it went. Ships are not diverted at sea. Waste is unloaded, then reloaded. This usually happens because a problem has developed at the other end (e.g. something that is no longer suitable for Spain is now suitable for Germany or it is impounded at port...China then send it to India, and so on)	

7.7	SE pointed out that the UK is on the precipice of huge problem following the China ban on plastics. The ban on paper is not an issue. There is no solution to where the plastic stockpiled in the UK is going to go. Limited / no outlets for 2/3 of plastics e.g. market exists for PET and Polyprop plastics. Nothing for other types of plastics.	
7.8	Should consideration be given to allowing the kerbside segregation of plastics to continue? This needs to be led by environmental regulators and there was general agreement that this may be an issue caused / compounded by environmental regulators; however, there was acknowledgement that the regulators would then have a hard message to sell to householders regarding recycling.	
7.9	Contractors at MRFs seek to offload baled waste to avoid costs of landfill.	
7.10	Long established, legitimate brokers would not be dissuaded by the introduction of E-Docs.	
7.11	There was general consensus that environmental regulators themselves may be the key enabler / creating the problem; however it was acknowledged that there may be difficult messages to “sell” to householders regarding recycling.	
7.12	Key recommendation: Tackling waste plastic (crime) should be the main priority for regulators.	
8.	Discussion Regarding Exporting Markets	
8.1	Although touched upon during the Brokerage discussion, it had been intended to discuss Exports specifically; however, due to time constraints, it was agreed that this may be an agenda item for a future meeting.	
9.	Discussion Regarding Key Enablers of Waste Crime	
9.1	Licensing and transportation discussion / suggestions: <ul style="list-style-type: none"> • Higher entry requirements are needed for waste carriers. More questions and regulatory checks. More thorough scrutiny of new applications (as opposed to renewals). • Opportunity of putting training and guidance on websites such as CIWM. • Consideration should be given to having different tiers of licence for different types of carrier, could also link this to the types of waste being collected. • White van man is the main problem – not large companies • Vehicle registration numbers (or details of vehicle hire companies used by the carrier) could be included in waste carrier licences • Waste Transfer Notes could include hazardous materials – a unique reference number could be allocated for normal waste and “H” appended if the waste was hazardous 	

9.2	<ul style="list-style-type: none"> • Duty of care to cover where did it come from and where is it going – a signed declaration as to understanding obligations would be a statutory defence (not a barrier to prosecution). 	
9.3	<p>Training, competency & guidance discussion / suggestions:</p> <ul style="list-style-type: none"> • Customers should know how not to enable waste crime - Provide training, guidance and tools to make the right choice. 	
9.4	<p>New recycling and re-processing innovations discussion / suggestions:</p> <ul style="list-style-type: none"> • The days of grants are over. There is a need for economic viability • Pyrolysis hasn't worked in the UK to date. Equipment does not meet British Standards, emissions tests, and other controls. Requires process that meets permit, planning and end of waste criteria. 	
9.5	<p>Potential new crime and criminal activities discussion / suggestions:</p> <ul style="list-style-type: none"> • How to reduce blind spots – members of the group agreed that appropriate information should be shared between other members in relation to threats, trends and signal crimes; however there was agreement that there was a lack of feedback from regulators on reported incidents and recommendations. AG advised that SEPA policy was to provide updates on reported incidents within 24 hours; albeit, this was not necessarily the final result and highlighted the potential benefits of the group, with regulators able to feedback on recommendations (This also formed part of the discussion for the next two themes) 	
9.6	<p>Industry interaction with public bodies discussion / suggestions:</p> <ul style="list-style-type: none"> • There is duplication of waste transfer notes for contractors • There contrasting views on whether regulators should provide advice to industry, particularly in relation to the cross border movement of waste. One view was that this detracted from the core role of investigators, while such advice was available at a price from other bodies; however, in terms of reducing costs, if some regulators provided free advice, this reduced costs. 	
9.7	<p>Reporting waste crime and communication strategies discussion / suggestions:</p> <ul style="list-style-type: none"> • A case was discussed in relation to an incident that was reported to a regulator, emphasising the lack of consistency on whether feedback was received, ultimately leading to incidents not being reported and missed opportunities for regulators to take early, effective intervention measures, including collaborative opportunities • The group agreed of the need to deal with the causes rather than symptoms but would like to know if there has been a successful prosecution in relation to Duty of Care. This could be circulated to members as a means of deterring those not complying with their obligations (Action 7) 	A007 AE

	It had been intended to specifically discuss Waste transfer notes / E-Docs; Duty of Care and Due Diligence; and Current recycling & disposal in the UK and beyond; however these had been touched on during earlier themes due to time constraints, it was agreed that these may be agenda items for a future meeting	
10.	Closure	
10.1	There was a review of the day's discussions.	
10.2	The initial terms of reference were agreed as appropriate, without need for amendment.	
10.3	It was agreed that plastics should be a priority for the group as it was the commodity they were likely to have most impact on with regard to developing a flourishing waste industry and reducing waste crime. This was compared to a commodity such as incinerator ash, where it was felt that simple changes in processes would prevent the issues caused by not allowing hot ash to be placed in sites until it had cooled down.	
10.4	No other competent business was raised	
10.5	Attendees agreed that the date of the next meeting should be some time around February 2019	
10.6	There was agreement to NF's suggestion that someone from the CIWM would be an appropriate chair	
10.7	Manchester was agreed as being the most suitable area for members to meet. NF and TP advised that they would likely be able to accommodate the group at facilities in the Manchester area; however this will be confirmed via communications between attendees ahead of the meeting dependant on number of members, etc.	
	End	

Annex X – High-visibility operational results tables

GLENLUCE 20 and 21 September 2018 (17:00-03:00 and 14:00-24:00)

Agency	Vehicles Stopped	Offences	Warnings	Advice & Guidance	Intelligence	Comments
SEPA				Yes and flyers		
Police Scotland	1	Yes				Several endorsable and non endorsable
DVSA	108	Yes				
NIEA	27 at Belfast 7 at Larne	No	No	Yes	Yes	Checks prior to embarkation

A74(M) at Gretna 3 October 2018 (08:00-14:00)

Agency	Vehicles Stopped	Offences	Warnings	Advice & Guidance	Intelligence	Comments
SEPA				Yes and flyers		Significant media coverage
Police Scotland	38	Yes	Yes			Several endorsable and non endorsable offences detected
DVSA		Yes	Yes			
BTP						
HMRC						
SBRC						
EA						

A1 at Pease Bay/Cove 3 October 2018 (08:00-14:00)

Agency	Vehicles Stopped	Offences	Warnings	Advice & Guidance	Intelligence	Comments
SEPA	17 of interest			Yes and flyers	Yes	ANPR patrol 02 and 04 October 2018 with Police Scotland
Police Scotland	30	10	Yes			Several endorsable and non endorsable offences detected
DVSA		3	Yes			X3 prohibitions
BTP						
HMRC		Yes			Yes	Several follow up enquiries to be carried out re VAT and Income Tax.
EA					Yes	

WALES 8-10 October 2018

Agency	Vehicles Stopped	Offences	Warnings	Advice & Guidance	Intelligence	Comments
NRW	207	9				
Police		1				
DWP		2				
DVSA		2				
HMRC		1				

ENGLAND

Agency	Vehicles Stopped	Offences	Warnings	Advice & Guidance	Intelligence	Comments
Environment Agency						No information submitted