



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

Action B15:

Intervention Bundle 1- Illegal Warehousing

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18 June 2018

This report was prepared with the contribution of the LIFE financial instrument of the European Union

AN EU LIFE+ PROJECT FOR 2014–2019

Version 1.2



Table of Contents

LIST OF FIGURES	I
LIST OF TABLES	II
1.0 EXECUTIVE SUMMARY	1
2.0 INTRODUCTION	2
3.0 BACKGROUND	3
3.1 <i>Incidents of illegal warehousing in Scotland</i>	3
3.2 <i>Collaborative and partnership working</i>	5
3.3 <i>Development of Intervention Bundle 1</i>	5
4.0 INTERVENTION IMPLEMENTATION.....	8
4.1 <i>Governance and accountability</i>	8
4.2 <i>Intervention objectives</i>	8
4.3 <i>Key stakeholder education</i>	8
4.4 <i>Public education</i>	9
4.5 <i>Stakeholder reaction</i>	11
5.0 LEARNING POINTS	12
5.1 <i>Getting relevant partners around the table</i>	12
5.2 <i>Keep workshops short in duration and focused</i>	12
5.3 <i>Keep use of software to the intelligence analysis phase</i>	12
5.4 <i>Interventions design</i>	13
5.5 <i>Interventions implementation</i>	13
6.0 LOOKING FORWARD.....	14
7.0 CONCLUSION.....	15
ANNEX I – CASE STUDY	I
ANNEX II – INTERVENTIONS TEMPLATE - HOW TO DESIGN AN INTERVENTION	VI
ANNEX III – COMMUNICATION STRATEGY	XXIII
ANNEX IV – QUESTIONS FOR LANDLORDS AND ESTATE AGENTS	XXVII
ANNEX V – LIFE SMART WASTE/CRIMESTOPPERS LEAFLET	XXVIII
ANNEX VI – INTELLIGENCE GATHERING STRATEGY	XXIX
ANNEX VII – BRIEFING NOTE BRITISH INSURANCE BROKERS ASSOCIATION	XXXV
ANNEX VIII– BRIEFING NOTE NATIONAL FARMERS UNION SCOTLAND	XXXVIII
ANNEX IX – MEDIA COVERAGE FOR CRIMESTOPPERS CAMPAIGN	I
ANNEX X – SEPA DIGITAL MEDIA	IV

List of Figures

Figure 1 - Waste on fire in warehouse (1), Glasgow.....	3
Figure 2 - Waste on fire in warehouse (2), Glasgow.....	4
Figure 3 - Baled waste hidden in plain sight on farm	4
Figure 4 – Terry A’Hearn (CEO, SEPA) with Expert Group members at Crimestoppers campaign launch.....	10

List of Tables

Table 1 - Crimestoppers campaign metrics (social media)	10
Table 2 - Crimestoppers media coverage.....	I
Table 3 - SEPA digital media	IV

1.0 Executive Summary

This report refers to the first intervention which has been developed by the LIFE SMART Waste Interventions Team.

Based on Intelligence Report B11 it was assessed that waste is vulnerable at four particular points; 1. Production 2. Transportation, 3. Warehousing 4. Disposal.

Under action B15 which is to 'set up cross agency intervention groups and deliver a minimum of three packages on interventions' it was decided at this stage to use an interventions approach to pilot it as a means of addressing one vulnerability in the chain that of 3 warehousing.

As part of this interventions approach the outputs of project actions B12 and B13 were utilised as the basis of forming the Expert Group to develop interventions as per the guide '*Designing Interventions for dealing with Waste Crime*' (In order to assist regulators, a short guide was produced '*How To Design An Intervention*'. This is attached as **Annex II**).

The project's Intervention Design Manual recommends a three-stage method to plan, test and use interventions. Accordingly, this report provides an overview of this approach:

- i. Analysing the situation and problems
- ii. Dependency modelling with iDepend
- iii. Identifying and selecting the intervention

In the outputs from project actions B12 and B13 it was recommended that the SEPA Interventions Team adopts an amended Interpol NEST as its primary framework. It was further recommended the team incorporated partnership design as a first stage dependency in the interventions approach. These were done.

The design manual was followed and amended as appropriate given the thematic nature of the problem that was identified and the objective that was set by the Expert Group (***Reduce the Incidence of warehousing in waste crime***).

An expert group was formed, unfortunately several key members were unable to attend. This Expert Group developed three potential interventions which had a likelihood of achieving the aim set by the Expert Group these are outlined in the body of the report.

The interventions recommended were then implemented and appear to have been successful, especially in raising awareness of the issue and distribution of educational materials.

Notably, no new intelligence on illegal warehouses was forthcoming during the Crimestoppers campaign.

This first intervention bundle is considered to be a successful application of the LIFE SMART Waste project's interventions design model.

2.0 Introduction

This report provides information on final progress and assessment of the first intervention under LIFE SMART Waste Action B15 'to set up cross agency intervention groups and deliver a minimum of three packages of interventions'.

The LIFE SMART Waste project was set up in 2014 for a 5-year period to tackle problematic waste streams 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'

Based on Intelligence Report B11 it was assessed that waste is vulnerable at four particular points; 1. Production 2.Transportation 3.Warehousing 4.Disposal.

Under action B15 which is to 'set up cross agency intervention groups and deliver a minimum of three packages on interventions' it was decided at this stage to use an interventions approach to pilot it as a means of addressing one vulnerability in the chain that of number 3 warehousing.

It was co-ordinated by SEPA LIFE SMART Waste Interventions Team and involved multi agency collaboration.

The intervention ran from March 2017 to March 2018. It will continue beyond, albeit in a reactive phase following the implementation of the Education and Enforcement phases of the Intervention.

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

3.0 Background

Warehouses are targeted by criminals for illegal waste disposal as they gain an unfair competitive advantage with significantly lower operating costs and the ability to undercut legitimate operators. A licensed site is not required, expensive plant for processing waste is not required and transport and disposal costs are significantly reduced, thus allowing quick start up, operation and market exit at high profit.

3.1 Incidents of illegal warehousing in Scotland

In Scotland there have been four serious incidents involving the illegal warehousing of waste in the past two years, some of which involved the warehousing of waste from other parts of the United Kingdom and beyond.

An example of 'warehouse waste' at one Glasgow warehouse site highlighted how much waste can be illegally dumped over a very short time period and the difficulties in regulatory oversight this causes for regulators.

The subsequent fire that occurred at the site not only damaged the environment by reducing air quality, but disrupted the surrounding road network for several days. The fire needed constant attention from Scottish Fire and Rescue Services and due to the smoke plume flights were redirected away from Glasgow Airport. Significant disruption and damage was caused to the Electricity, Gas and Water infrastructure



Figure 1 - Waste on fire in warehouse (1), Glasgow



Figure 2 - Waste on fire in warehouse (2), Glasgow

In the recent past several farmers have been left with significant clear up costs and/or potential prosecution following becoming involved, unwittingly or otherwise, in the illegal warehousing of waste.



Figure 3 - Baled waste hidden in plain sight on farm

It is recognised that unless a particular warehouse falls directly under SEPA's regulatory remit, e.g. by being a site that has a Waste Management Licence or Exemption, then we may not necessarily be aware of any problematic activities associated with illegal waste management.

Other organisations such as Police Scotland are not as familiar with environmental legislation and may not see anything suspicious with vehicles transporting waste to industrial areas or warehouses. So for many organisations this type of illegal activity falls under the regulatory radar and largely goes unnoticed until it is too late to intervene.

SEPA, therefore, understand that in order to have an impact on illegal waste disposal associated with warehousing, we must work in collaboration and partnership with other organisations that may also have a vested interest in reducing this problem/tackling this issue.

3.2 Collaborative and partnership working

Collaborative and partnership working is therefore important and external assistance is critical if we are to make a positive impact in dealing with this and other problematic waste issues.

To make this possible we have to be mindful of the SEPA LIFE SMART Waste Intelligence reports which formed the basis of the activities undertaken and the focus for interventions. These identify issues affecting joint working in tackling waste crime and highlights particular common barriers that make collaborative and partnership working more difficult.

In addition, another report highlights that true partnership working is easier said than done. It is clear that barriers to partnership working exist and that these can impact on our effectiveness to deliver lasting results.

Although the Interpol NEST approach is used effectively for the establishment of partnerships internationally, it is not as effective an approach for tackling waste crime at regional and local levels.

To be effective, the formation and assembly of partnership organisations should be given a higher priority at an earlier stage in the intervention design. In fact, partnership design has to be incorporated into the first stage as part of a crucial dependency of the design of an intervention package itself.

This means that there is a greater level of investment from the individuals and organisations involved as they have helped shape the intervention design, had an input in setting objectives and being involved in operational planning resulting in an increased chance of successful interventions being implemented.

3.3 Development of Intervention Bundle 1

It is against this background that the Warehousing Intervention was developed as a first intervention.

In order to fulfil Action B15, the workflow was implemented as follows:

- Identification of the intervention target through an intelligence report (*B11- Produce four intelligence reports*). In this case it was identified that waste was vulnerable to criminal exploitation at production, transportation, warehousing and disposal stages. Interventions were considered at each of these vulnerable points. In this case B11 identified warehousing as the most appropriate area to test the interventions approach. It should be pointed out that the selection of warehousing in no way diminishes the importance of tackling production, transportation and disposal, merely that warehousing was identified as being a suitable area for focus to apply the interventions model as it is a real problem in the waste 'chain'. It is also appreciated that mistakes were made in the initial application of the model and warehousing allowed for a narrow focused analysis to take place on its application before applying it to potentially more significant and less well defined vulnerabilities. These learning points are explored more fully later in this report.

- Following the identification of this workstream, an interventions group was established based on the outputs of Action B12¹.
- Utilising the project's Intervention Design Manual² developed as part of Action B14.
- The interventions bundle, to be effective, had to mix differing types of intervention across a number of areas (financial, policy, legal, communications etc.) and followed analysis conducted by the expert group which identifies drivers and enablers at all three levels (operational, tactical and strategic). Whilst enforcement was an important component it was not the only or most effective intervention, nor was SEPA necessarily the most appropriate lead agency.
- Design of the interventions bundle also included cost/benefit analysis, management structure for implementation, necessary actions, timescales, risks and benefits assessment.

The first two stages were utilised of a three stage model in order to design the appropriate interventions as per the *'Designing Interventions For Dealing With Waste Crime: A Practical Guide'* (Stage 1 Plan, Stage 2 Test, Stage 3 Use interventions).

In the B13 report³, there were 5 recommendations:

1. Development of flowcharts and checklists
2. The design of a terms of reference outlining aims and objectives, and defining individual roles and responsibilities
3. The design of an integrated communications strategy
4. The development of an internal audit approach to keep the partnership focused on the agreed priority
5. The development of a partnership agreement pro-forma

This is the assessment in respect of each of these recommendations:

1. These flowcharts and checklists have only been produced for the running of workshops, it was anticipated that as the project developed and it moved towards executive action, these would be produced and made available for the wider community potentially using the LIFE SMART Waste Hub. This was not developed as the Expert Group and LIFE SMART Waste staff were aware of the issues and dealt with them. This was appropriate given the scale of the intervention but should be considered on an individual basis, depending on the needs and scale of the intervention.
2. The terms of reference for the Expert Group were defined by the objective it set (to reduce the incidence of warehousing in waste crime). The key roles have been filled by the Interventions Team, but it was hoped this would change as the project evolved,

¹ B12: Barriers to joint working: Issues affecting joint working in tackling waste crime. Link: https://www.sepa.org.uk/media/219292/20151214_b12_barriers-to-joint-working_v1-published-on-lsw-websitepdf.pdf

² Refer to the 'mini guides' for the LIFE SMART Waste Intervention Design Manual Action B14). Link: <https://www.sepa.org.uk/regulations/waste/life-smart-waste/publications/>

³ B13: Overcoming barriers to joint working: Group structures required. Link: https://www.sepa.org.uk/media/340378/lsw_b13_partnership-working-report_v10.pdf

however this did not transpire and SEPA led the intervention from start to finish. In future interventions it would be appropriate to identify the lead agency at an early stage and give them overall responsibility.

3. The Communications Strategy has been designed and implemented (attached as **Annex III**). The Expert Group concluded that internal communications should be concise and timeous and this has been carried out so far as possible with the deliberate use of plain English.

External communications were seen a key dependency on achieving the objective therefore as that developed it has been recorded and reviewed. Again the lessons learned from the formulation and application of the integrated communications strategy will be made available to the wider community.

The formal launch of the Interventions campaign, executive phase was on 4 December 2017, and its positive impact on the effectiveness is reflected in the interest generated in social and conventional media.

4. Audit took place before and after every meeting of the Expert Group, with minutes being circulated as soon as practicable following meetings to ensure focus and accuracy. It is anticipated that for future interventions the learning from this approach will be made available to the wider community.
5. A formal partnership agreement has not been developed in this case as it was not seen to be necessary for the involvement of partners. This was continually reviewed as the intervention developed.

As the intervention evolved, the Expert Group members concluded that the intervention was, and should remain, a SEPA led intervention. The structure put in place seemed to be strong in that members were keen to contribute and identify with the group but still saw SEPA as the lead agency, basically because they had called the first meeting. It was hoped that the Expert Group would establish roles and responsibilities, however even at this stage, members are getting used to the fact that concept and governance lies with the co-ordinators i.e. SEPA.

4.0 Intervention implementation

4.1 Governance and accountability

Governance was provided by the Project Board at a Strategic level and guidance/instruction provided by an External Steering Group at a tactical level. In respect of the operation aspect, the Expert Group provided expertise and advice. All of these comprise a range of internal and external subject experts and in the cases of the Project Board and External Steering Group, international expertise.

In particular, the Expert Group comprised the following partners;

- Police Scotland
- Crimestoppers Scotland
- Scottish Business Resilience Centre / Scottish Fire and Rescue
- West Dunbartonshire Council
- North Lanarkshire Council
- Neighbourhood Watch Scotland

It should be noted that there were several other key partners identified who, for various reasons, were unable to become involved.

4.2 Intervention objectives

This was set by the Expert Group as: **'Reduce the Incidence of Warehousing in Waste Crime'**

An indicator of success was identified as any reduction in the incidences of warehousing in waste crime.

To date, no illegal warehouses have come to light. At this stage, the campaign aspect of the intervention may be deemed to be complete, but the operational regulation/investigation of illegal warehousing continues as 'business as usual'.

Further to this, the Expert Group identified three clear priorities for the intervention:

- Improve communications and education strategy (elements to include name and shame, raise profile of issue, better targeted campaigns)
- Improve penalties and enforcement (elements to include legislation, enforcement efficiencies, improve judicial process)
- Better intelligence gathering and sharing (elements to include improve infrastructure, properly trained staff)

It is assessed that there was an improvement in communications and education as evidenced in public awareness. No prosecutions or penalties were applied as no criminal warehousing came to light during the executive phase of the intervention. In respect of intelligence gathering, as evidenced in the Crimestoppers campaign, whilst public perception was increased, there was little difference in intelligence submissions.

4.3 Key stakeholder education

In March 2017 the Interventions Team began preparation for the Executive Phase. This involved the implementation of the Interventions Design Manual.

It was agreed that initially an education phase would take place, which would take the form of a series of interviews with influential stakeholders, 'victims' and interested parties as well as an information campaign which would assist in educating the general public.

The Interventions Team undertook a series of interviews with key players in warehousing to better understand the issue. These included landlords/estate agents, industry bodies and regulatory bodies. The list of questions used to interview these key players is attached as **Annex IV**.

4.4 Public education

4.4.1 Crimestoppers campaign

This learning influenced the public information area of the education phase.

Through SEPA, the LIFE SMART Waste project collaborated with Crimestoppers Scotland (CS) to undertake an educational campaign to deter and prevent the illegal dumping of waste in warehouses. Crimestoppers was deemed to be the appropriate lead for this activity as it is a highly regarded and trusted independent charity that specialises in helping law enforcement agencies to locate criminals and help solve crimes.

The specific Crimestoppers campaign objectives were:

- To raise public awareness of the impact of waste warehousing crime
- To encourage the reporting of suspected illegal dumping behaviours and increase the actionable intelligence about suspected offenders

The Crimestoppers campaign consisted of:

- Information leaflets
- Media engagement
- Social media advertising
- Intelligence gathering

4.4.2 CS information leaflets

Information leaflets were produced for distribution to the public by members of the Expert Group (including Neighbourhood Watch and SEPA). The leaflet is illustrated in **Annex V**.

4.4.3 CS media engagement

Crimestoppers organised a photo call and issued a media release⁴ to launch the campaign on Monday 4 December 2017. As listed in **Annex IX**, media engagement consisted of 17 articles in national, regional and online publications with a reach of 117,017 and an advertising equivalent value in excess of £12,441.

⁴ Also available on the SEPA web site: <http://media.sepa.org.uk/media-releases/2017/crimestoppers-charity-asks-public-to-speak-up-anonymously-about-illegal-warehouse-dumping/>



Figure 4 – Terry A'Hearn (CEO, SEPA) with Expert Group members at Crimestoppers campaign launch

4.4.4 CS social media

On behalf SEPA and the LIFE SMART Waste project, Crimestoppers commissioned a specialist social media agency (Hydrogen) to run a 2-phase social media advertising campaign in January/February 2018 and March 2018.

The campaign used two different social media platforms to reach the Scottish public in both rural and urban locations. Facebook was used solely to drive traffic to the CS website on a Cost per Click (CPC) basis. Twitter was used for both raising awareness and for driving traffic to the CS website, paying for reach on a Cost per View as well as a CPC basis.

The agency created over 30 different ad variants targeting a variety of audience across the social networks. These ads utilised a variety of different lead images, videos and targeting options to reach the correct audiences with tailored messages.

As summarised in Table 1, the overall campaign reached c.450, 000 people, achieving almost 23,000 clicks through to the Crimestoppers campaign web page⁵.

Channel	Reach	Link clicks	Cost per link click	Expenditure
Facebook	235,537	18,932	£0.09	£1,765.00
Twitter	211,846	3,884	£0.16	£635.00
Total	447,383	22,816	£0.11	£2,400.00

Table 1 - Crimestoppers campaign metrics (social media)

⁵ Crimestoppers website: <https://crimestoppers-uk.org/in-your-area/scotland/we-ask-the-public-to-speak-up-about-illegal-warehouse-dumping/>

4.4.5 CS intelligence gathering

In addition to highlighting an anonymous telephone service, the Crimestoppers campaign web page provided a link to an anonymous online form enabling users to safely and securely pass information about relevant crime. The campaign generated 61 clicks on the online form and a total of 16 forms were completed. Crimestoppers reported that several forms had to be discarded because they were incomplete or contained irrelevant data.

4.4.6 SEPA digital media

SEPA's digital media channels (web site, e-newsletters and social media) were also used to support the messaging and extend the reach of the Crimestoppers campaign, as summarised in **Annex X**.

4.5 Stakeholder reaction

Following the launch of the awareness campaign, several organisations came forward with requests to become involved. These organisations requested briefings for their 'trade' publications/websites and they were each provided with the Crimestoppers/LIFE SMART Waste leaflet as a matter of course. In particular, the British Insurance Brokers Association also requested a specific briefing for their members (Attached as **Annex VII**) and the list of questions, as did National Farmers Union (Scotland) (briefing materials attached as **Annex VIII**).

It is not yet known what the impact will be, but early indications is that these have had a positive impact.

The launch of the public information phase took place on Monday 4 December 2017. Again obtaining commitment from interested parties was challenging and well attended, though with reduced numbers.

Through the interviews with key players it was also ascertained that representative bodies had significant influence and education activities have taken place at all levels to gather their support and influence their members to avoid becoming involved in illegal warehousing of waste. As well as being a key component of interventions design, the application of this tactic at all three levels was more effective than it would have been if restricted to one level.

The model was applied in one location which was deemed a success by all partners involved and is described in the case study in **Annex I**.

A key element of interventions design is the policy change, however to date this has not been applicable to the warehousing intervention, though may be appropriate to subsequent interventions.

The enforcement phase of the Intervention commences immediately after the education phase and incidences of illegal warehousing of waste will be dealt with as they become known.

5.0 Learning Points

During this first intervention design and implementation there were a number of challenges and learning points which were valuable to project and will be useful to future interventions.

5.1 Getting relevant partners around the table

This proved a challenge due to the lack of intelligence around which agency had a statutory responsibility for warehousing. This has still to be fully clarified, however it would appear that Local Authority Planning departments have responsibility under planning legislation. Several key players were invited and were unable to attend i.e. a property landlord who had been left with abandoned waste in a warehouse, a professional body representing key practitioners who saw no interest for their members.

It became apparent that in harmony with the findings of the previous reports that human interaction was key to achieving buy in from organisations, personal relationships built up over a number of years were utilised to make initial contacts in organisations which led to the right people attending. Without this personal touch, it is unlikely that such commitment would have been forthcoming.

When an Expert Group was formed, it was clear that as SEPA had called the first meeting, it was our intervention, which is not how it is outlined in the Interventions Design Manual. Despite several attempts at getting other members of the Expert Group to lead the intervention, that role still lies with SEPA.

5.2 Keep workshops short in duration and focused

The initial introductory/discussion based workshops were conducted by two SEPA staff over a two hour period with a series of questions being posed to the group which provoked discussion and provided information to base intervention ideas on.

It is interesting to note that information received from the internal SEPA group workshop was reflected by the external group who had no access to the SEPA workshop information.

The short, sharp, focused nature of the meetings was also commended by both groups which was encouraging.

5.3 Keep use of software to the intelligence analysis phase

The iDepend software was used during the second Expert Group meeting and for a number of reasons was deemed by attendees to be a distraction.

It was found that utilising the software during meetings of the Expert Group proved to be a distraction and reduced the dynamism and creativity of the Group as they focused on the software.

It is recommended that the use of the software is restricted to the intelligence analysis stage prior to interventions being recommended.

iDepend is a dependency modelling tool that can help regulators identify intervention strategies and approaches in order to improve the environmental compliance behaviour of operators. At the same time the tool analyses the possible successfulness of the selected approach.

This evidence based system can then be used to highlight what methods of regulation will work, why it will work and what resources are needed in any given situation. It provides an

objective, evidence based options selection tool for resource managers (and others) to assess the likelihood of success for commitment of resources to a particular series (bundle) of interventions.)

5.4 Interventions design

The Expert Group developed an overall aim (reduce the incidence of warehousing in waste crime) and three main objectives (improve communications and education strategy, Improve penalties and enforcement and better intelligence gathering and sharing).

These were developed into three main stratagems, Intelligence Gathering Strategy (attached as **Annex VI**), Media/Communications Strategy and an Interventions Team Work Plan encompassing all of the elements.

Each of these was prepared and developed using the SMART principles (Specific, Measurable, Achievable, Realistic and Timebound).

The use of the interventions Manual was not intuitive, clearly being written in an academic style to be interpreted by practitioners.

This initially led to issues due to the document being perceived as impenetrable and a lot of time was spent interpreting what the manual meant and intended, as it is intended to be a readily accessible evolving document which can be utilised as a crib guide for officers designing an intervention from scratch.

Once assumptions were dispelled and the basic principles of Interventions Design were explained and applied, the intervention began to take shape. This approach has not been attempted by an environmental regulator before and each step was slavishly followed, leading to extended time frames and lack of quick, perceptible progress. This process is likened to driving a car for the first time, where the initial stages are tortuous and counter intuitive, and thereafter, with experience, become easier and more natural. It is anticipated that future interventions will be more intuitive and 'slicker' in analysis and application.

5.5 Interventions implementation

Once the intervention was agreed, a number of interviews took place with representatives of organisations who were not members of the Expert Group but were seen as being influential. It was a challenge getting some of these to engage and in some cases involved turning up unannounced to ask a series of pre-prepared questions. It also involved enlisting the assistance of executive level staff to interject at senior level to ensure co-operation.

Once relevant partners were agreed on the style, scale scope and duration of the implementation, progress was quickly visible. An example is that the official launch of the Crimestoppers campaign on Monday 4 December 2017 was well attended and received.

6.0 Looking forward

Whilst incidences of warehousing in waste crime seem to be on the decrease, it is not appropriate to be complacent about the issue. There may be locations in existence which have not yet been discovered, however it is thought was anticipated that the media/education campaign would have helped to expose these.

It is clear that a single warehousing incident can have a significant impact on the public purse, the environment and the economy (one incident involving fire is estimated to have cost approximately £1 million) and this coupled with the disruption and loss of amenity makes the intervention approach good sense.

During the course of the intervention, no illegal warehouses have come to light.

7.0 Conclusion

The Warehousing Intervention has demonstrated that the Interventions Model is a valuable tool, however it requires to be adapted and amended in line with the problem being tackled and the objectives set. It has delivered results in the areas it has been applied and can be utilised in 'business as usual' scenarios, so long as practitioners are utilised to give their best advice.

The strength of the interventions approach is that it allows several experts to formulate the intervention with the highest likelihood of success, it also gives scope for the most appropriate agency/partner to lead and direct (although in practice, whoever calls the first meeting is expected to lead). It also gives an objective defensible evidence base to request resources for implementation which is grounded in experience and scientific calculation.

The weakness of the interventions approach is persuading key partners of the importance of the issue and, even more difficult, obtaining their support and commitment for the intervention. In many cases compliance, not commitment was achieved. In other words, partner organisations may have agreed to assist in the intervention without yet being fully supportive of the interventions model and therefore in some cases support was perfunctory. Another weakness is that the process, on first trialling, is counter intuitive as the continual checking of progress and compliance with the interventions model (referencing the guidance manuals) was challenging in the initial application for project staff and the Expert Group. Also, members of the Expert Group have successful, tried and tested ways of working challenged by the interventions approach. This challenging of set ways of working could be a strength, but in practical application, it was found to be a weakness. The moving of the application of the iDepend dependency modelling software to the intelligence analysis stage may go some way to addressing this.

There is a real opportunity to try innovative and bold tactics at all three levels to deal with issues (operational, tactical and strategic levels). It also gives those involved a vehicle to evidence suggested interventions through the iDepend software results. It also gives partners an opportunity to lead where there is a reluctance in some instances, where they are not the initial responders to an issue or incident. It is anticipated it will be possible to put this into practice as more interventions are applied and partners become more comfortable with the interventions model.

The main threat to the success of the interventions model is that it is counterintuitive and is time consuming. This can be readily explained as in the pilot application of the model, each stage and step of the model was followed in detail to ensure a thorough piloted testing. The interventions model should be used flexibly to address the problem or issue identified, but care should be taken to ensure the model is applied correctly if steps are skipped or deviations are carried out. It may also be assessed as another talking shop by key partners who are enthusiasm and intention rich but resource and time poor. This was addressed in part by holding two hour short, sharp, focused workshops which allowed vigorous submission and debate without taking up a full day away from the day job.

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

Annex I – Case Study

A Practical Application of the Interventions Approach as Detailed In The Interventions Design Manual.

For ease of reading, the Case Study has been initially described using the 8 Step process described in the Interventions Manual, followed by a free flowing narrative description of the Summary of Events.

Step 1 Context

This particular Industrial Estate was one of a number of industrial estates set up in Glasgow in the years following the Second World War in an attempt to reduce Glasgow's economic dependence on heavy industry. The estate comprises of 15 units ranging from 5,000sq.ft to 25,000sq.ft. In recent years the estate has become run down and neglected and many of the tenants have vacated the premises leaving only a handful of business operating in the area. The businesses occupying the estate are predominantly associated with coachbuilders, garage repair services and motor engineers.

The landlord responsible for this Industrial Estate will be referred to as the Property Landlord, who own and rent many industrial and office spaces throughout the west central belt of Scotland.

This Industrial Estate has suffered from neglect and poor management over recent years. The general area is not covered by CCTV, is located in close proximity to a densely populated area of housing and is poorly lit at night. These factors have combined to encourage both commercial scale and domestic deposition/warehousing and other types of anti-social behaviour issues within the estate. The quantities and distribution of deposited waste are suggestive of stockpiling or warehousing prior to final disposal.

The Property Landlord, in an attempt to attract new tenants, has recently carried out a programme of improvements to the estate, including a general clear up of illegally deposited waste. As part of the improvement work, an area of land within the estate comprising of approximately 600 metres of overgrown greenbelt/trees has been cut down to improve the appearance and appeal of the site. This area of land is owned by the Property Landlord and run as a commercial enterprise by him. During this clearance operation, a significant amount of previously undiscovered waste has been uncovered. As the waste has been uncovered it has been removed from the land owned by the Property Landlord and placed on the pavement which is technically the responsibility of the Local Authority. Some of the waste recovered from this area of greenbelt was removed off site. However, other waste which was left at the site overnight pending removal has attracted more depositing/stockpiling in the area and this has increased over consecutive days to the point that there were concerns the waste could be set alight by the local youth who frequent the area at night.

This issue was raised as a potential problem to SEPA's Intervention Team on 7 September 2017 by a colleague in the Scottish Fire and Rescue Service who was concerned about the fire related aspects and the fact that the delay in moving some of the discovered waste was encouraging additional depositing at the site including a significant number of waste tyres (approximately 100). Tyres are the subject of a separate intelligence report under B11 and play a significant part in warehousing as well as having previously caused environmental issues in high profile incidents dealt with by SEPA as Scotland's Environmental Regulator.

Summary: The material which has been illegally deposited is low value waste which has a negative value, hence being illegally disposed of. In terms of the regulatory framework, there are no permissions in place for such activity to be carried out at this location. Whilst this waste

has been deposited/stockpiled in the open air as opposed to within a physical building, it can still be regarded as warehousing. The scale is different, however there are similarities with recent instances of waste being illegally stored in the open air on farm land.

The presence of such waste has a detrimental effect in respect of the local economy as it detracts from the attraction for businesses to set up there as well as being an encourager for continued illegal activity as per the 'Broken Windows' model (Wilson and Kelling 1982 and New York Police Department 1994).

It is suspected but not confirmed that local communication was quickly utilised by illegal depositors to encourage others to use the area. Precise technologies are at this time unknown, but suspected to be mobile telephones and social media as well as word of mouth.

There is a reasonably well maintained minor roads network within the industrial estate which acted as an enabler for further illegal deposit as this infrastructure is not controlled i.e. no gates, restricted access or CCTV coverage.

Step 2 Targets

Summary: Following the initial report of the illegal deposition, an expert group was called together by the Interventions Team and it was agreed that existing tenants were targets of the intervention as well as future tenants and the depositors themselves.

It became clear that the illegal depositing was continuing and in doing so the social and economic value of the area would decrease as those individuals carrying out the activity would continue as they became aware that the regulatory authorities were taking little or no action to prevent or remedy it.

Socially, the area would continue in a downward spiral if the activity was not halted and those existing tenants may either leave or give negative reviews for future tenants, thus acting as opinion leaders. It was important to ensure that their opinions of the area were positive ones.

Step 3 Concerns and Barriers

Summary: It was identified by the expert group who met on site that the regulatory options open to the expert group would have little chance of success and would be resource intensive for the anticipated result. The objective set by the group at the initial meeting was to discourage further waste from being illegally deposited and make the area attractive to new tenants.

It was clear that the illegally dumped waste was a symptom of the apparent lack of maintenance and care of the buildings and infrastructure in the industrial estate. In order to deal with the cause and make the area less attractive to illegal behaviour, a number of partnership working issues required to be resolved. The expert group agreed to work together to achieve this aim.

Step 4 Objectives

Summary: The expert group agreed that the objective of their intervention activities would be to move existing waste off site and the area would be cleaned up and amenities improved to make the area more attractive to prospective tenants and less attractive to prospective illegal depositors. This was to be carried out in as short a timescale as possible but before end October 2017.

Whilst this was a different specific objective from that set by the Expert Group for the overall intervention, it would assist in achieving that overall objective in a local context and address the identified problem in this case.

Step 5 Selecting Appropriate Interventions

Summary: It was agreed by the expert group that the most effective to achieve the set objectives would be to remove the existing illegally deposited waste, tidy the area up to make it more attractive and install CCTV. This approach would require partnership working as partners acting in isolation would only deal with symptoms, not causes. If these objectives were met, the need for formal enforcement action would be removed, the attractiveness of illegal behaviour would be removed thus saving resources for all members of the expert group as well as improving the commercial amenities in the area to the benefit of businesses and the community.

An intelligence gathering strategy was formulated in an effort to obtain an accurate picture of the scale of problem and potentially of those involved and this has led to an increase in intelligence submissions for this area.

In this way, the interventions proposed would prevent further illegal activity from occurring in the future (Preventative), deal with existing waste preventing further harm (Re-active) and tidy up the area to prevent further illegal activity (Remedial).

Step 6 Identifying Partners and Delivery Agents

Summary: The initial attendance by SEPA at the locus was initiated by Scottish Fire and Rescue. It quickly became apparent that although both had a part to play in delivering the interventions, neither were best placed to lead the interventions. SEPA thereafter co-ordinated the expert group and the Local Authority and the Property Landlord who were identified as the most appropriate Delivery Agents carried out the interventions supported by SEPA and Scottish Fire and Rescue.

Step 7 Modelling Your Scenario to Forecast Chances Of Success

Summary: This step was not carried out using the iDepend software as the expert group dynamically assessed each option and agreed upon the interventions with the most likelihood of success.

Step 8 Make Recommendations

Summary: The expert group concluded that led by the Local Authority and the Property Landlord, most effective to achieve the set objectives would be to remove the existing illegally deposited waste, tidy the area up to make it more attractive and install CCTV.

Evaluation

Summary: The situation will be monitored and the approach evaluated following a suitable passage of time, (the suitable passage of time has not yet been set, but SEPA plan to revisit the area within the next three months to assess progress) or in light of further intelligence being received of illegal activity.

Case Study – Summary of Events

How did we approach the problem?

After being informed about the issue, the Interventions Team contacted the Unit Manager of the Glasgow Regulatory Services Team on Thursday 7 September 2017 to inform them and offer assistance. A visit to the site was made by a member of the Glasgow Regulatory Services Team on Monday 10 September 2017. Following this initial visit, the offer of assistance was accepted and a member of the Interventions Team accompanied by a member

of the Glasgow Regulatory Services Team visited the Industrial Estate on Tuesday 12 September 2017 to assess the situation and explore possible options to resolve the issue.

During the visit a number of tenants were spoken to and an intelligence picture was developed in relation to historical waste issues at the site and also more recent illegal depositing/warehousing on site. Intelligence relating to the waste tyres which had been deposited adjacent to the locus was also gained during this visit.

Following this visit, the Property Landlord was contacted to ascertain their intentions on disposing of waste material removed from the greenbelt/tree area, including timescales for removal of waste. Had this not been done, there was a potential impact on the public purse. A meeting was arranged to meet the Property Landlord and this meeting took place on Tuesday 12 September 2017. At the meeting a general discussion about responsible waste disposal took place and the Property Landlord agreed to dispose of the stockpiled waste appropriately in line with relevant legislation.

It was thereafter assessed that traditional methods of enforcement action open to SEPA (issuing warning letters/serving notices/reporting to Crown Office and Procurator Fiscal Service (COPFS)) would not be the most effective way to solve the issue and would be too time intensive. The stockpiled waste being removed from the greenbelt/tree area by the Property Landlord was being done so in an attempt to improve the area but the lack of speed in doing so was resulting in the problem being compounded by further illegal waste deposition. This resulted in the problem becoming worse rather than better and ultimately the responsibility of disposing of the waste was being shifted from the Property Landlord onto the Local Authority who would be responsible for anything being left on the public highway or footpath pending further removal by the Property Landlord.

The most effective and efficient way to deal with the issue and reduce further illegal deposit/stockpiling at the site was to encourage the Local Authority to become involved and have an input before the situation escalated and became a more significant and costly problem to deal with.

To this end a member of the Interventions Team contacted the Local Authority on 13 September 2017 to discuss the issue. The Interventions Team suggested to the Local Authority that it would be beneficial to all parties if they could open a dialogue with the Property Landlord and assist with a speedy resolution to the problem in accordance with the Expert Group objectives and to the benefit of all involved. It was agreed that the Local Authority would take on a greater involvement and options discussed included the removal of existing stockpiled waste at the site and the installation of a CCTV surveillance camera(s) at relevant locations within the estate. The possibility of the Local Authority providing skips to the Property Landlord to assist in the removal of waste was also discussed.

A further meeting took place on 26 September 2017 with representatives of the Local Authority and representatives of Scottish Fire and Rescue Services, the Property Landlord and SEPA. The purpose of the meeting was to discuss and confirm that there would be co-operation between the Local Authority and the Property Landlord in order to remove existing waste and clear the area. The meeting was positive and the Local Authority offered the Property Landlord help with supplying skips and helping dispose of waste appropriately. Subjects discussed included the Local Authority chipping the wood waste on site, supplying skips to help with waste removal and offering free disposal or reduced costs for waste being taken to their local recycling centre for disposal. The one condition set by the Local Authority was that the Property Landlord should install CCTV equipment on the units located nearby. The Local Authority stated that without the installation of CCTV at the stated locations, the problem would persist and continue to be a problem negating any good work carried out by the Local Authority and the Property Landlord.

What was the outcome?

- Warehoused waste is currently being moved off site in accordance with the requirements of relevant legislation (including waste tyres which were removed by the Local Authority)
- Communication between the Property Landlord and the Local Authority is helping reduce the chance of further illegal waste disposal at the site
- If/when cameras are installed this will decrease the occurrence of further fly-tipping and other types of anti-social behaviour
- SEPA has gathered intelligence in relation to illegal tyre disposal which will result in an audit being carried out at local waste tyre producers for educational and Duty of Care purposes with the intention of reducing further instances of illegal waste tyre disposal in the area
- Further intelligence gathered at the site by SEPA has been passed to Police Scotland related to an illegal deposition incident at the Industrial Estate. Following this transfer of information the Police have informed SEPA that the vehicle involved is not insured and the Police will place this information on the Scottish Intelligence Data Base (SID log) with a view to stopping the vehicle. The vehicle in question is registered to an individual who has a Waste Carriers Licence (WCR/R/*****) so this information will be provided to SEPA intelligence Unit and the issue will be further investigated by SEPA.
- This specific issue was addressed and action taken in a very short timescale in an effective and efficient manner using an innovative interventions approach which co-ordinated by SEPA led to an intervention being undertaken by an organisation that was partly negligent (the Property Landlord) and an organisation that was better equipped to tackle the physical nature of the problem (the Local Authority) due to their available infrastructure and responsibility for public land
- This approach brought together organisations that were not familiar with each other prior to the issue being raised and has formed a collaborative working partnership that can be built upon and repeated in future interventions.

Further Benefits of this approach

- SEPA operated in a manner that highlights the organisation as an enabler rather than being bureaucratic and obstructive
- SEPA will have a credible reputation amongst tenants at the site following the clear up
- The general area will benefit from being more aesthetically pleasing for everyone using the facility once the clean-up operation has been concluded and CCTV has been installed
- Valuable court time and public money has not been wasted due to not having to report the issue to COPFS

Following the initial interventions activity in this case study, a significant increase in intelligence submissions relating to warehousing and waste crime have been reported to SEPA. This increase can be evidenced to be directly attributable to the interventions and dependency modelling carried out in this case study. Whilst this is encouraging it is hoped to further develop and increase the intelligence gathering capability carried out during interventions. This will lead to an increased understanding of the scale and scope of warehousing and waste crime and it is likely that intelligence gathering will become a further priority during the financial year 2018-2019.

Annex II – Interventions template - how to design an intervention

IDENTIFYING THE PROBLEM

The main aspect of any effective intervention is the correct threat assessment dealt with by the best intervention in the context of society and the problem.

Throughout this guide/toolkit/manual the iDepend model is recommended to be utilised in the intelligence assessment phase to determine which intervention has the greatest likelihood of success in addressing the identified problem.

Scoping the problem

Before carrying out an intervention at any level, it is important to identify the nature and scale of the problem to be addressed, taking into account the desired behavioural change and level of intervention(s).

In coming to reasoned conclusions around interventions design, a number of assessments need to be carried out. These utilise tried and tested methodologies to provide organisations with opportunities to develop methodologies which can be developed to deliver effective and efficient interventions.

Step 1 Context

Assess the “CONTEXT” or operating environment in which the target/targets exist including vulnerabilities which might be leading to, encouraging or attracting waste crime opportunities.

Crystallise this analysis into CONCERNS and BARRIERS which articulate the undesirable circumstances giving rise to the waste crime situation which requires intervention.

There are many models and tests which can be applied, but using the National Intelligence Model (NIM) allows organisations to carry out an objective assessment of the problem and the risk(s) it poses.

The National Intelligence Model is a well-established and recognised model within law enforcement and regulators that managers use for:

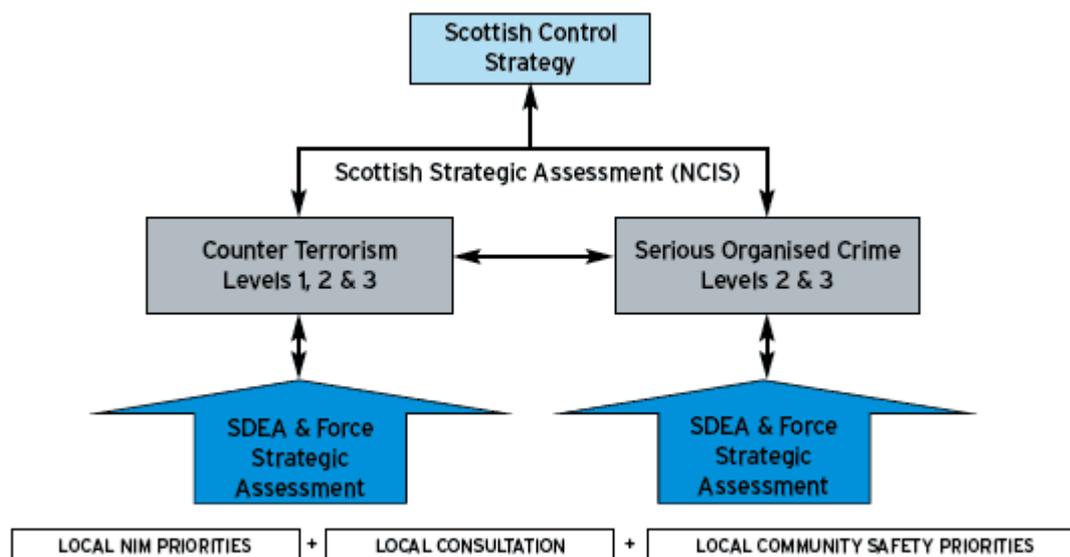
- Setting strategic direction
- Making prioritised and defensible resourcing decisions
- Allocating resources intelligently
- Formulating tactical plans and tasking and co coordinating resulting activity
- Managing the associated risks

It is important to note that although NIM is utilised by Police in the United Kingdom, the NIM is not just about crime and not just about intelligence – it is a business and decision making model that can be used for most areas of investigation and regulation.

NIM provides a standardised approach to gathering, co coordinating and disseminating intelligence which can be integrated across all partner agencies.

Benefits of the use of NIM include consistency of approach, focus on organisational priorities, encouraging problem solving and developing innovative approaches to interventions.

NIM works at three levels, which is the model adopted by this toolkit.



In the first case as part of the strategic assessment, a horizon scanning exercise should be undertaken, utilising PESTELO or similar to better inform the decision making process for the Organisation. The process involves assessing the Political, Economic, Social, Technological, Environmental, Legal, Organisational situation. It may also consider the impact/influence of media, both conventional and social.

Divert, Disrupt, Deter, Detect

Any intervention carried out should seek to Divert, Disrupt, Deter or Detect. These are explained more fully in 'Letting Our Communities Flourish' A Scottish Government publication from 2009. Although it identifies Serious and Organised Crime (SOCGs) as the target of the document, this lends itself to being applied to any identified problem.

Each outcome can be achieved in isolation or in concert with others, and ideally an intervention will address all four outcomes and instigate behavioural change.

Desired outcomes should be agreed logged, though can be amended in light of intelligence updates, constraints or priority changing. All amendments and reasoning should also be logged in case of future review or challenge. It is recommended that a Policy or Decision Log is commenced and maintained throughout the intervention and only closed off following the cold debrief. It should be retained for a period in accordance with organisational policy as it may be required in any legal proceedings.

Assess need for intervention

If the NIM process is followed, the need or otherwise for an intervention should become apparent. If an intervention is not necessary, the alternative tactic to be used should be outlined and recorded.

If an intervention is assessed to be required, all options should be explored as to what it will be, when it will take place, who/what will be targeted and what the Aim and Outcomes of the intervention should be.

The wider context of business, society and environment in which the target and the regulator exist is relevant in determining who or what should be the appropriate target of interventions, as well as to what an appropriate objective might be. Along with step 2 it will help identify vulnerabilities which might be leading to, encouraging or attracting waste crime opportunities.

It is best to do this as the first step of the process but conclusions from this step should be reviewed as necessary, particularly after step 4.

This stage can assist in assessing what factors might be creating circumstances in which waste crime can flourish.

This stage is closely linked to step 2 regarding the “targets” of any potential interventions. Taken together, steps 1 and 2 describe the current situation in a way that helps identify (in step 3) what is wrong with the current situation (“Concerns and Barriers”). This in turn helps identify in later stages where and how to act to rectify things.

It is important that sufficient expertise regarding the scenario in question is brought to bear on the analysis.

This should be undertaken as a collaborative approach by a group of experts in a workshop type setting. The expert group should consider each what is relevant to their specific scenario.

The choice of which factors are most relevant should be made bearing in mind that the aim is to identify what is creating the circumstances in which waste crime can flourish. Having chosen relevant factors the scenario to be addressed should be described in those terms.

Consider the demographics of the targeted industry in terms of numbers of companies, and size. Is the type of activity which could at times be illegal their main occupation? (as in a waste management company or water companies) or a “side product” as in a waste producer or chemical company? Do the companies have branded products that customers recognise? Do the companies rely on investment from banks and shareholders? These all provide opportunities for an intervention or a bundle of interventions.

Are there payments for waste of systems of producer responsibility and fee-free waste collections, removing the exchange of money at point of collection which dis-incentivising illegal activity. Some aspects might be: competitive local market conditions, changes in gate fees due to relative changes in supply of wastes and capacity to accept them

Waste flows and financial exchanges at each stage should be considered. This is obviously particularly important to understand in relation to waste crime situations. A value chain analysis might be useful to identify who is making money at which stages and where the target fits into that chain, therefore providing opportunities for intervention.

At this stage it may also be appropriate to consider the existing regulatory framework including the offences and penalties available: How “fit” is it to allow regulators to achieve their aims?

Any currently underused regulatory powers (e.g. duty of care) that could be applied should be explored as per the Conflict Management Model.

The needs of society / environment and the tools, information and processes required to fulfil those needs should be considered. If this approach has been used to characterise the target then it might be sensible to do so for the wider society / environment.

Technology is sometimes contrasted to behaviour, in that techno-fixes are presented as ruling out the need for individuals to change their behaviour. However, individuals and technologies interact, and this can influence the effectiveness of a technology in terms of its desired impact (e.g. smart meters and how they are used in practice). This interaction also enables new practices, and the meanings of these practices, to spring up and take hold quickly (e.g. tweeting).

Time is a finite resource that gets used in the course of carrying out everyday activities. Like money, it is a scarce resource that people have to allocate across competing demands. Changes in schedules (e.g. set by formal institutions) can often result in changes in individuals' practices, for instance, school hours and commuting habits.

Hard infrastructure relates to the firm boundaries to people's behavioural choices presented by the environments in which they live (for example, without a bus service, there will be no chance of bus use). Such factors can often prevent even motivated people from undertaking the behaviour in question.

Many behaviours (e.g. cycling to work) involve the use of objects (e.g. a bike, cycle racks at work), and the lack of necessary objects can stop a practice from being undertaken. As with technologies, objects and individual users interact, such that sometimes the object can 'act back' on its owner and heavily influence how much time an individual spends on which practices (e.g. waste in the home 'acts back' on the householder who spends time cleaning and sorting recycling for collection).

Assess which level it will target (Operational, Tactical, Strategic)

In accordance with NIM, the level at which the intervention should take place should be decided. There is no reason if it is appropriate, to intervene at more than one level contemporaneously or in succession as part of the overall intervention as an example, it would be valid to carry out checks on carriers and brokers relating to waste tyres (Level 1) while at the same time addressing company boards and industry leads (Level 2) whilst approaching Scottish, UK and European legislators with a view to improving/enhancing legislation and policy in relation to waste tyres (Level 3).

In reality, the majority of interventions are likely to take place at levels 1 and 2, but there is no reason why a level 3 intervention should not be considered in most cases.

Step 2 target (s)

Assess who/what it will target through intelligence

Identifying who or what might be the "target" of any interventions is very relevant to what those interventions might be and who is best to deliver them. Analysing the characteristics of the

targets (along with step 1) will help identify vulnerabilities which might be leading to, encouraging or attracting waste crime opportunities.

This is best undertaken as the second step of the process after the wider context has been assessed. This allows a review to take place of a wider range of potential “targets” of interventions than might otherwise be considered.

Conclusions from this step should be reassessed as necessary, particularly after step 4.

This process will help take account of a wide range of factors that might be creating circumstances in which waste crime can flourish.

Taken together with step 1, this stage describes your current situation in a way that will help identify (in step 3) what is wrong with the current situation (which we call “concerns and barriers”). This in turn helps identify in later stages where and how to act to address matters.

It is important to not only identify the “obvious” targets such as non-compliant or criminal operators rather than also including the higher level and more strategic targets. In doing so an organisation may address symptoms of a problem but not the causes.

Another pitfall is trying to identify and analyse too many factors to describe the target. It is important therefore that sufficient expertise regarding the scenario in question is brought to bear on the analysis.

This stage should be undertaken as a collaborative approach by a group of experts in a workshop setting with findings recorded and logged.

A decision needs to be reached to identify targets and then these should be characterised in terms of their relevant “attributes”.

Clear and broad consideration should be given to who or what the possible targets might be. In doing so, it should be borne in mind not just “who is undertaking illegal waste activities” but also who is providing the waste, who is creating incentives for the activity, who is providing the tools and equipment etc. It is also appropriate to consider who the end users of waste (or recycled/ reclaimed materials) are and consider the policy makers and lawmakers who might be able to remove some of the vulnerabilities identified in step 1.

Considerations should include: why choose this target and who else might have been targeted? What behaviour of the target needs to change? Will that behavioural change allow the intervention Aim and Objectives to be achieved?

Identify a broad range of TARGETS the intervention(s) (not just the waste operators) and develop an understanding of their current and likely behaviour and what influences that behaviour

Using National Intelligence Model (NIM)

Through the NIM process, an intelligence product should be commissioned which specifically focuses on the problem identified with potential intervention opportunities. Whilst this should be commissioned early, it should be updated regularly as the planning phase progresses and through the operational phase.

Although individuals have traditionally been the targets of interventions, there is no reason why activities, sectors/media, or even industries cannot be identified targets, so long as the targeting is intelligence driven.

Step 3 Concerns and barriers

This is a key interpretative stage that uses assessment of the current situation to help identify what requires to be addressed - what are the vulnerabilities that allow or encourage waste crime to take place.

This stage is used after assessment of the current situation in steps 1 and 2 and before moving on to developing objectives and interventions in steps 4 and 5. A broad Aim or Objective may already have been provided or it may be useful to identify a broad objective before step 3 and then refine the objectives of the intervention and/or make them more detailed as a better understanding of concerns and barriers is built up.

This stage consists of an interpretation of previous assessments of targets and wider context within which waste crime can or may take place, rather than a focus upon criminal activities or criminal actors per se. It can assist identify where opportunities exist which could be exploited by criminals.

Supported by the analysis conducted in steps 1 and 2, this step requires problem statements to be made that explain the circumstances giving rise to the waste crime situation. In either case the statements will then be used in steps 4 and 5 to set objectives and develop interventions.

To avoid a focus just on the criminal activities and illegal operators, use the wider assessments of context and targets in step 1 to identify the higher level and more strategic concerns and barriers

Having described the current situation in steps 1 and 2, an interpretation should now take place in terms of “what is it about the current situation that is causing or allowing waste crime to take place? – what are the vulnerabilities in the whole system that creates circumstances favourable to illegal waste activities?” These can be either “concerns” which cause (or may cause) our waste crime situation to arise and /or “barriers” to the targets making a change to stop the illegal activities.

Analysis should then be carried out and set into problem statements that articulate the circumstances (“concerns and barriers”) giving rise to the waste crime situation. They should make reference to the particular aspects of the context and targets to which they relate. This can help place focus more specifically on exactly what needs to be addressed and identify the opportunities that exist to act in order to address the specific concerns and barriers by acting on specific targets to achieve specific objectives.

ADDRESSING THE PROBLEM

Step 4 Objectives

When it has been assessed that there is a problem which requires to be addressed by means of an intervention, planning can then take place.

Develop clear OBJECTIVES to address the concerns and barriers in accordance with what is realistic and achievable. (It may be appropriate to identify a broad objective before identifying

a barrier or concerns around achieving that objective and then refine then objectives or make them more detailed as a better understanding of barriers/concerns is developed.)

Develop a broad range of interventions (not just operational/ regulatory) that could make up a bundle of interventions which when applied to targets should deliver set the Aim and Objectives of the intervention.

Having articulated what is wrong and what needs changing in step 3 it is important to then express what is hoped to be achieved, so that interventions can be developed to address concerns/barriers and achieve the overall Aim and Objectives.

A broad objective may already have been set or it might find it useful to identify a broad objective before step 3. However, once step 3 is completed it will be possible to develop more detailed objectives that relate specifically to addressing concerns and barriers.

This stage can help ensure that the interventions developed in step 5 are aligned to address the concerns barriers developed in step 3 and the objectives provide a link between step 3 and step 5 (interventions).

Careful consideration should be given to ensure that Objectives which might not be achievable or are too vague are set. To address this, the “S.M.A.R.T.” approach to developing objectives should be utilised (Specific, Measurable, Realistic and Time Bound).

The Objective should be set in the light of the concerns and barriers developed from the analysis of the target and context as described above. It may be appropriate to develop an objective to remove or “squeeze” vulnerabilities identified in step 1. Consider what behaviour of the target needs to change, and then what will happen as result and what outcomes that might result in. Alternatively, a broader outcome based objective can be set and drilled down into what has to happen to realise that outcome. Either way, consideration needs to be given to the chain of events, sometimes called a logic map and these can be further developed in the logic map as knowledge of the other aspects grows.

Appendix ‘A’ provides some examples of objectives.

As stated previously, it is advisable that objectives are SMART. So when developing an Aim and Objectives, these should be as Specific and Time bound as possible in terms of the who what where and when. For example: “Stop waste management company x involvement in illegal waste activities within 6 months, but allow them to continue operating their legal waste operations”. Some thought should be given to being Measurable, Achievable and Realistic in the light of your of analysis of the target and context as described above.

Before the building of solutions begins, a well described picture of the four elements described above is required.

This can then be used to produce a description of the particular problems in more coherent terms which throw light on the difference between the objectives set and the relevant attributes of the target and the wider world.

While doing this it may be required to change the Aim, Objective, Target or all 3.

Review the Objective so that it is realistic in terms of the target chosen, the nature of the target and the wider context.

Review the Target in light of the nature of the Target, the Context and the Aim and/or Objective.

More information may require to be gathered on the attributes of the Target or the Context before moving on to step 5.

Practical Steps

One of the first tasks is to identify an operational lead and any other key roles. The lead should ideally be an expert in the intervention required, supported by a deputy who can have several other roles within the intervention (e.g. logistics, briefing). If the intervention is likely to end up in a court case at whatever level, the deputy should **not** be an intelligence officer.

The interventions lead and their deputy should be fully briefed on the problem and the proposed intervention and given time to identify sufficient resources to achieve the desired outcomes, giving due consideration to the four D's.

Identify Aim and Outcomes of intervention

When the lead officer has formulated an intervention, they should compose an intervention Aim and a series of outcomes. These should adhere to SMART principles in that the Aim and Outcomes should be Specific, Measurable, Achievable, Realistic and Timebound.

These should be agreed with managers and should only be changed in the light of significant changes in the intelligence picture or a resetting of intervention priorities.

Apply Conflict Management Model

When the need and format of the intervention has been agreed, an assessment should be made of Organisational capability to achieve the agreed aims.



This application allows the intelligence to be assessed and the threat the target poses, an assessment can then take place as to whether SEPA has the powers and Policy to achieve the aim and outcomes of the intervention. Options can then explored to achieve the operational Aim and Outcomes and only thereafter would executive Action take place.

It should be noted that the application of the Conflict Management Model is an ongoing process which allows review regularly and as appropriate. Any policy changes should be logged and retained.

On assessment of the intelligence product, if it is assessed there is a threat still posed by the proposed target, powers and policy should be reviewed to ensure organisational capability to achieve the intervention aims and outcomes.

When considering an intervention, or bundle of interventions, consideration should be given to the scope and limitations of organisational powers as per the Conflict Management Model. As an example, in SEPA, reference should be made to the Enforcement Pyramid as detailed below relating to what level of enforcement is desired to be taken.



If SEPA does not have powers to apply, (e.g. vehicle stops) identify who does have the powers and engage early with this key partner.

Whilst doing so, consideration should be given on how to overcome any perceived barriers to partnership working (See LIFE SMART Waste Document ‘*Overcoming Barriers To Partnership Working*’ M. GAY 2016). Consideration should be given to adopting the Interpol NEST approach. The National Environmental Security Task Force (NEST) approach provides a partnership framework that helps overcome barriers. The NEST has been used as an operational framework to build international collaborations tackling environmental crime since 2012. Designed and recommended by Interpol as a multi-disciplinary approach to collaboration between police, customs, environmental agencies, the judiciary and other partners, the NEST represents the most recent and thorough attempt yet at providing a practical guide to building partnerships.

Step 5 Selecting appropriate intervention(s)

This stage allows is carried out following the initial development of the intervention Aim and Objectives. It works towards solutions being found to overcome concerns and barriers and thereby achieve the Aim and Objectives of the intervention.

This is the key stage but has to be informed by earlier stages.

Focus on the traditional operational aspects, however a wider view of the types of interventions that could make up a bundle should be considered, effectively thinking out of the box, exploiting all legal means and being bold. Whilst success is desirable, it is also desirable to try interventions and come to a reasoned conclusion that they are not effective in the circumstance they are applied to, but should not be discarded for other situations.

A wide view of the types of interventions that could make up a bundle should be considered – thinking out of the box and not just focusing on the traditional operational aspects. For example a behaviour change may require a societal type intervention delivered by others. A bundle could include policy and regulatory change at EU level.

In developing interventions specific considerations should be given as to how to address barriers and concerns to achieve the intervention Aim and Objective. Consider the ISM, method here – by identify current attributes – knowing the change required – and identifying the barriers to achieving that for each significant attribute and consider interventions to make that shift.

In selecting interventions, a set of interventions that are already used within the organisation can be considered, however these may limit choice. By using this toolkit, reference can be made to other lists of interventions which are available. Whether, references are made to the menu or new ones are developed to meet specific Aims and Objectives, the starting point for building the correct solution is to have a coherently described picture of the “concerns” or “barriers” which express the inconsistencies, differences, gaps etc. that you see between the context, attributes of the target and objectives that are providing opportunities for the target to act in an illegal and/or harmful way.

For each of the concerns and barriers developed above, consideration can be given on how to act (interventions) on each target and which objectives each one might achieve. More than one intervention should be considered to improve the chances of achieving the Aim and Objectives. The important point here is to consider what intervention will address the concerns / barriers. There is no specific process for doing this but solutions are most likely to arise in the discussions and the interaction of the group and the facilitation of that discussion.

Having developed a number of interventions consideration should be given to separating these into:

Preventative Interventions: those which act to prevent an illegal activity from occurring

Re-active interventions: those which act to prevent harm after the act has occurred

Remedial Interventions: those which act after harm has occurred but may prevent further illegal activity

This approach can help consider if each of these aspects has been considered. It is very unlikely that an Organisation would deliberately only want to react to criminal activities and not prevent future waste crime.

Consideration should be given to using the Bow Tie approach to demonstrate all three aspects above have been considered. The Bow-Tie model can also help consider sequencing of interventions: which should come first and which should follow? The bow-tie models were developed in the health and safety applications to describe visually the sequence and structure of aspects of unsafe incidents. It shows more clearly how these incidents develop and how an intervention can take place at many points to interrupt the completion of the sequence. It is possible to model a criminal activity in the same way. This picture then could help demonstrate how the introduction of an intervention or interventions at one or more of these points, can intrude and disrupt the sequence so that the sequence is not successfully completed.

The point is that interception or interruption can occur at any point, or at more than one point, simultaneously but it is likely that the preference would be to be effective as early as possible.

When the intervention has been identified, a series of checks and balances should be carried out to ensure the intervention is lawful and in accordance with Organisational Policies and Procedures.

Further assessments should be carried out to assess Equalities Impact and Communities Impact, as well as any other local requirements.

By carrying these out, the proposed intervention should be proportionate, necessary and lawful.

Step 6 Identify key partners and delivery agents

Interventions will be only work if successfully delivered, so finding the best body to do that is of vital importance. This is utilised after selecting interventions which are most likely to achieve the Aim and Outcomes. This improves the chances of intervention success.

This is the final stage of the methodology, although commitment from the chosen delivery agents needs to be secured before implementation.

Focus may only be on the traditional operational and regulatory bodies. A wider view of the types of delivery agents that could deliver a bundle of interventions is to be encouraged.

For each intervention, consider who is best to deliver it. There are no particular published methods that you might refer to regarding who might deliver the interventions, the so called “delivery agents”. It is expected that for each case, the options available will be considered based upon the powers and responsibilities of various bodies.

Consideration will require to be taken of their (own and via partnerships) capabilities, resources and priorities, and the will to make it happen. SEPA will be the obvious choice for many interventions, and in some cases they will need the support of the Police. But other examples of bodies who have an interest in addressing illegal waste activities can be co-opted on an ad-hoc or permanent basis. Whilst the Police are likely to be constant partners, other agencies should be considered as and when each intervention requires it.

In some cases other non-statutory bodies may be better placed for some types of interventions for some targets. For example the Environmental Services Association (ESA) is well placed to educate waste producers about their duty of care responsibilities. It has the knowledge of the law and contact details of waste producers through its members and it has incentive to do so because it wishes to improve the viability of the legitimate waste industry. The ESA is currently undertaking such a project with the support of the Environment Agency in England.

Step 7 Modelling your scenario to forecast chances of success

Before applying any interventions in the real world, a dependency analysis model called iDepend can be built to predict the probability of achieving the Aim and Objectives of the intervention.

This is used after developing an Aim and Objectives, interventions and delivery agents, but before applying the interventions in the field.

It will give confidence that the proposed solution will work or not. It can also help identify if further intelligence is required before committing to a particular bundle of interventions

iDepend uses the Aims, Objectives, interventions and delivery agents developed in previous steps to forecast probability that those objectives will be met.

You will be led through this stage by your workshop facilitator or secretary who has experience of using the iDepend model and has on-line access to the iDepend server.

iDepend can be applied to predict the probability of achieving the Aim and Objectives of the intervention objective. This is based upon the premise that achieving the Aim and Objectives is dependent upon the success of each intervention and; the success of each intervention is dependent upon specific attributes of the target, the wider context, the capability of the delivery agent etc.

Having completed steps 1 to 6, the information to construct separate dependency “modules” is available to show what success is dependent upon for each intervention and each delivery agent. These can then assemble each module into an overall dependency model which shows, layer upon layer what the objective is dependent upon. By inputting your opinion of the probability that the final “leaf” dependencies can be met, the model can be run to forecast the likelihood of the Aim and Objectives being achieved. The model also provides a sensitivity analysis to show which dependencies are having the most impact on thwarting achievement of your objective. Users with a good knowledge of iDepend can build their own models, input data and run reports to forecast likelihood of intervention success. However the general well informed users might not want to each become proficient at using the model. With that in mind a number of template modules and simplified questionnaires can be developed which can be used to build models and input data without expert knowledge. In this case one or 2 “expert users” can be trained to build and run the models or this service provided by an external contractor.

Review and Iteration

Having “run” the first iDepend model to forecast the likelihood that the selected bundle of interventions will work to achieve the Aim and Objectives of the intervention, it is likely that the forecasted probability is not what would be hoped for. By revisiting the relevant parts of earlier thinking (and this might even mean going back to review your original objective or targets), it is possible to home in on specific vulnerable aspects and develop some alternative interventions. The iDepend model can then be amended and re-run until a model has been developed which adequately addresses the situation provides some assurance that your chosen interventions might work. Alternatively it might highlight areas of uncertainty in the analysis of context or attributes of a target and thereby indicate further intelligence needs to be collected before there is confidence that the proposed solution will work.

In many instances, Organisations will be able to carry out interventions without the assistance of external partners, but will normally still require to engage internal partners. The principles outlined in this toolkit are the same for internal and external partner engagement, but clearly internal engagement is usually less troublesome (but not always).

Select DELIVERY AGENTS for each intervention, including a wide range of bodies such as governments, trade bodies, waste producers and end users etc. to ensure the focus is not on traditional regulatory approaches. It is appropriate to consider MODELLING the scenario to forecast chances of success by developing and running dependency models.

RECOMMEND the use of a bundle of interventions and /or recommend further intelligence needs to improve confidence that recommendations will be successful.

At several points in the process there should be a review and if necessary iterate the interventions, delivery agents and /or objectives to optimise success.

Step 8 Make recommendations

At this stage it is important to clearly articulate an evidence based proposal to meet the Aim and Objectives of the intervention.

After completing steps 1 to 7 recommendations can be made. This pulls together key elements of the whole process into a final coherent solution.

The recommendations will include the bundle of interventions (from step 5), their targets (step 2) and delivery agents (from step 6) and the objectives (step 4) that they should achieve. It will use the outputs from the iDepend model (step 7) to provide a forecast of chances of success and what that is dependent upon.

The iDepend model will not forecast 100% chances of success when dealing with the complicated and uncertain scenarios which are typically faced. So it is important to be honest about the forecast and indicate which particular dependencies are having the most impact on thwarting achievement of the Aim and Objectives of the proposed intervention.

Any proposed bundle of interventions, targets and delivery agents and what Aim and Objectives they should achieve, backed by your analysis and your iDepend modelling to forecast the chances of success should then be submitted.

In some cases it may be that analysis has identified gaps in in knowledge about the context or the target and there is a recommendation that further intelligence is required to improve confidence that the recommendations will be successful.

Where an objective is already set from above, then the recommendation could be a forecast how realistic that objective is and, if necessary, recommend alternative more realistic objectives and accompanying interventions and delivery agents.

Pre operation engagement

Initial Informal Engagement

When an intervention, or bundle of interventions has been agreed with a clear Aim and Objectives set, initial contact should be made with partners. Whilst objective contact can be made, this is less likely to be successful than utilising established contacts through members of the organisations. In this way, it is more likely that the correct management level, or area of expertise is contacted. It is not unusual for several unofficial initial contacts to be made before the most appropriate person is contacted. This is particularly the case when engaging with external partners.

Where possible, this initial informal contact should take place as soon as practicable after the above steps have been completed. In this way the knowledge is still fresh and an impetus still ongoing. It also conveys to the partner the urgency of the need for intervention.

This initial contact realistically will usually be by telephone, though face to face is ideal, however at this stage a contact is needed, not the building of a relationship.

When the correct contact is identified, before contacting them, it would be useful to find out about their areas of expertise, background, skills etc. This allows for a more flowing initial conversation to take place.

It is also useful to have prepared a list of benefits for the partner of assisting in the intervention. These could include, but not exclusively, mutual outcomes, enhanced reputation, and assist meeting Key Performance Indicators.

If there is an agreement in principle to assist in the intervention, the project moves to the next stage, formally gaining support for the intervention.

Should there be a lack of support or, more likely, antipathy through lack of resources, competing priorities, timescales, then it may be appropriate to draw on the assistance of more senior colleagues if the partner's assistance is essential to the intervention. Reference should also be made to '*Overcoming Barriers To Partnership Working*'.

If the above steps are followed and informal agreement is reached to assist in the intervention, then the next stage is akin to pushing at an open door.

Formally gain support

When a list of potential partners is available, they should be telephoned, preferably by the meeting organiser who will usually be the intervention lead. Proposed dates and locations should be discussed with an overview of the intervention. This allows details to be ironed out pre-meeting such as deputies attending, concerns over involvement, misconceptions explained etc. and provisional dates arranged.

Following this, an e mail invitation should be sent as soon as possible.

A follow up email containing a draft agenda and sat nav details/public transport/collection arrangements should be sent out at least 24-72 hours before the meeting.

The chair should telephone potential attendees after the e mail is sent to ensure attendance and gain forewarning of any issues.

If lunch or refreshments are to be provided (strongly recommended) dietary requirements should be asked for.

Where possible, the meeting should take place in a central meeting area which is convenient for all (or most) attendees. Arrangements should be made for adequate parking and a member of the host organisation utilised for meeting and greeting attendees, ensuring they are directed to the correct meeting room, facilities etc. In this way, the meeting chair can remain in the meeting room ensuring no attendees are left floundering in strange room in a strange building (if external partners). Telecon/Videocon arrangements should be made well in advance and tested at least one hour before the meeting starts.

There are many good quality guides on how to chair and run a meeting available, however at a minimum, the Chair should introduce themselves and the attendees, state the purpose of the meeting, how it will be run. It should last no more than 90 minutes, with a further one arranged if necessary. It should be minuted with a closed minute if appropriate.

Following the meeting, send the minutes out as soon as possible thereafter with a note of thanks to the attendees detailing any other meetings if required. If the minutes are going to be delayed, send the e mail of thanks as soon after the meeting as possible.

Assuming all necessary meetings are held, chaired and minuted as above with agreement on assistance, then it is possible to move to the next step.

If some partners decline to assist, a decision should be made as to whether they are essential to the intervention. If they are, a stratagem should be prepared to encourage their participation. If they are not essential, an email of thanks for their participation to date in good grace should be sent. This leaves options for future partnership working open for the future.

Following this, internal partners briefed and dates/times/targets identified and confirmed through updated intelligence.

Briefing

An initial operational order should be produced. This should be in a recognised, structured format such as the National Briefing Model (IIMARCH). Each section should be completed as appropriate (Information, Intention, Method, Administration, Risk Assessment, Human Rights) and the relevant protective marking applied.

Any risks identified during this should have mitigation put in place

Equalities Impact Assessment should be completed and any actions raised acted upon.

It is important that appropriate resources are identified and made available (internal and external). These should be entered where and when available in the Operational Order.

All briefings should be carried out utilising operational order (Operational level) or briefing papers (Tactical and Strategic levels).

Carrying out the Intervention

Activity

On the days of executive action being carried out, activity carried out with lead officer utilising Conflict Management Model and dynamic risk assessments as appropriate and in accordance with organisational policy and procedures.

At this stage, it is important to identify different types of intervention and expand the intervention as necessary to achieve the Aim and Objectives (road stops, site visits, leaflet drops, boardroom visits, legislative change). Where this is being considered, there should also be a guard against mission creep, whereby activities take place which exceed the scope of the intervention as originally planned and agreed.

As a minimum, roles should include Lead Officer (Senior Investigating Officer), Deputy (with sound overall knowledge of intervention Aim and Outcomes), Logistics Officer (could be deputy) and media officer.

Each agency should ensure they are acting within their domestic legislation and in accordance with organisational policies and procedures.

Media

Media should be involved throughout the activity period, with briefing taking place beforehand. Organisational position should be made clear with media taking lead in interaction with external conventional and social media. A talking head should be made available of a sufficiently high level in the organisation and they should be suitable briefed. This should not be the interventions lead, as they will be focused on leading the intervention.

Post Activity

Immediately following the intervention activity, it is important to carry out a hot debrief with all staff involved, internal and external. This can be in the form of three simple questions: What was good, what was not good, if we were doing this again tomorrow, what would we do differently.

Monitor the issue/target which was addressed by the intervention activity and take remedial/further intervention action as necessary

The important part in the period following the intervention activity is to assess results and prepare cold debrief report (following a formal debrief process). This should form part of the formal evaluation process.

Preparing for Evaluation

The previous sections should have helped develop a coherent set of objectives, targets, interventions and delivery agents to address specific attributes of the targets and the context in which they and the Organisation are acting. No doubt considerations around cause and effect and the “logic chain” of what is affecting what: a hypothesis if you like for why and how interventions change behaviour of the target to achieve intervention Aims and Objectives.

Before actually applying you interventions for real, it is important that such a hypothesis is set out and include all the elements in the logic chain. These should include assumptions about cause and effect and about the “mechanism” that makes an intervention work and the context allows that mechanism to work.

Having done that, the Organisation will then be in a good position to evaluate not only the success or otherwise of the solutions but provide an insight in to how and why the interventions works in the given context. The method of evaluation called “realist evaluation” seems to be the most appropriate for most types of scenario where the Organisation is not simply asking ‘what works?’ or, ‘does this program work?’ but asking instead, ‘What works for whom in what circumstances and in what respects, and how?’

Final Steps/First Steps

At this stage it is important to log learning points e.g. on LIFE SMART Waste Hub in order to share learning for all partners.

Following on from this, when an Organisation is considering preparing an intervention, they should access previous learning in debrief reports to learn from previous experience and the whole process starts again.....

APPENDIX A

Sample Aims

To stop an activity

To bring an operator into compliance

To restore or remediate

To punish

To deter others from getting involved in illegal activities

To remove the incentive for illegal activity

To achieve an environmental aim.

To improve compliance generally for particular sectors, waste flows etc.

To restore or remediate

To punish

To deter others from getting involved in illegal activities

To remove the incentive for illegal activity

To achieve an environmental aim.

To improve compliance generally for particular sectors, waste flows etc.

Prepared by (Name, Organisation)

Date (e.g. 17 April 2017)

Annex III – Communication Strategy

COMMUNICATIONS STRATEGY B15 WAREHOUSING INTERVENTION

Statement of Purpose

This communication strategy will

- Disseminate information to those involved in the warehousing industry relative to their responsibilities relating to waste
- Help us engage with members of the Expert Group and beyond to assist in the achievement of the Expert Group's set objective '*To reduce the incidence of warehousing in waste crime*'.
- Engage effectively with those involved in the warehousing industry
- Publicise and demonstrate the effectiveness of the warehousing intervention bundle
- Ensure those involved in warehousing understand SEPA's role
- Change behaviour and perceptions where necessary

Current Situation

SEPA is Scotland's environmental regulator. We protect and maintain a safe, healthy and sustainable environment for the people of Scotland, ensures that business and industry is aware of and complies with environmental regulation, and warns and informs the public in the event of environmental incidents.

As part of the LIFESMART Waste project, it has been identified that warehousing of waste is vulnerable to criminal exploitation. As part of the project, the Interventions Team is developing a bundle of interventions with the set aim of '*reducing the incidence of warehousing in waste crime*'.

An important component of the Interventions is to communicate effectively with partners, those involved in warehousing and the public to make them aware of the work ongoing and their responsibilities in respect of waste and its production, transportation, warehousing and ultimate disposal. The priority of this marketing and communications strategy is warehousing. Where opportunities arise to publicise and educate in respect of production, transportation and disposal arise, these will be exploited.

One of the strengths of SEPA and the LIFESMART Waste project is their collective ambition to protect and enhance Scotland's environment. As Environmental Regulators, we have a wealth of experience in environmental matters which can be brought to bear along with partners to achieve our aims.

A weakness which has been identified is that we know little about the waste industry in general and warehousing of waste in particular. That weakness is currently being addressed.

There is little regulatory oversight of warehousing and this has allowed criminality to flourish. There may also be ignorance on the part of those involved in the warehousing industry of their legal and moral obligations in relation to waste.

There is an opportunity for SEPA and LIFESMART Waste to work with partners in meaningful collaboration to reduce the incidence of warehousing in waste crime to achieve the ultimate aim of eradicating waste crime. There is a further opportunity for LIFESMART Waste to utilise the Interventions Design model and make the learning from it available for others to use, thus protecting and improving the environment world-wide.

A threat to the success of the intervention is that our lack of knowledge of the industry and the players therein forces us to formulate strategies and deploy tactics which are flawed. There is also a threat that the good work we carry out goes unrecognised thus allowing criminality to flourish. An effective marketing and communications strategy will offset this threat and publicise activities which will ultimately assist in driving criminality from the waste industry.

Interventions Objectives

An Expert Group was set up to inform the activities of the Interventions Team and partners. This group identified three key objectives:

1. Improve penalties and enforcement
2. Ensure better intelligence gathering and sharing processes and
3. Improve communication and education strategy.

This Communications and Marketing Strategy will assist in achieving objective 3 as well as assisting in achieving objective 2.

These objectives are consistent and aligned to One Planet Prosperity and SEPA's statutory purpose.

Communications and Marketing Objectives

- To ensure all those involved in the warehousing industry are aware of their responsibilities
- To inform those involved in the warehousing industry and beyond of the Interventions being carried out
- To provide opportunities for those involved in the warehousing industry at any level to contribute to the Interventions.

Stakeholders

This list is not exhaustive and is prepared in the full recognition that we do not know a lot about the warehousing industry and will be under regular review:

- Landlords
- Insurers
- Chartered Surveyors (letters)
- Estate Agents
- Local Authorities
- Waste Hauliers
- Farmers
- Landowners of secluded properties and estate
- Producers of waste
- Hauliers of waste
- Brokers
- The general public

Messages

Audience	Key Messages	Key Media
Landlords	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Insurers	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Chartered Surveyors (letters)	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack

Estate Agents	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Local Authorities	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack Intelligence briefing relative to specific issues in accordance with Information Sharing Protocols
Waste Hauliers	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact How to contact Intelligence development opportunities	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Farmers	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact Intelligence development opportunities	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Landowners of secluded properties and estate	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact Intelligence development opportunities	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Producers of waste	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact Intelligence development opportunities	Main Stream Media Social Media Industry media Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
Hauliers of waste	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact Intelligence development opportunities	Main Stream Media Social Media Industry media Briefing/education pack
Brokers	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for	Main Stream Media Social Media Industry media

	Who to contact Intelligence development opportunities	Personal contact and briefing at all three levels (operational, tactical and strategic) Briefing/education pack
The General Public	Legal Responsibilities Moral Responsibilities Possible sanctions What to look for Who to contact Intelligence development opportunities	Main Stream Media Social Media

Evaluation Strategy

An evaluation should take place on a regular basis to assess the effectiveness of the marketing and media campaign.

As a basic guide, the number of media articles featuring the interventions campaign will be regarded as a measure as will the number of enquiries received in its respect by conventional means and social media.

Further measures of success will be the increase of intelligence submissions as a result of the media and marketing campaign and the increase of enforcement activities undertaken. This should eventually lead to a decrease in the number and severity of incidences of warehousing in waste crime.

Supplementary Strategies

Communications and Marketing are expected to produce their own strategies in support of meeting of the objectives of this strategy.

Annex IV – Questions for landlords and estate agents

General

1. What typical checks are undertaken on potential tenants?
2. What is the market like for letting warehouses/farm buildings?
3. What drives this market?
4. Are there any financial prerequisites/checks required for potential tenants? E.g. one month's refundable deposit required
5. If not, do you think introducing this would discourage tenants using warehouse premises for illegal waste disposal/storage?
6. Generally, what is the method of payment for renting premises? E.g. cash in hand, direct debit, etc.
7. Are potential tenants required to disclose the nature of their business, i.e. the purpose for renting the premises?
8. Do you carry out any kind of inspections on the premises that you rent out, whilst the tenant is in situ? If so, how regular are these?
9. Are there any security measures employed around your premises? E.g. CCTV, security guards etc.
10. What legislation governs letting of warehouses/farm buildings?
11. What agency has responsibility for enforcing regulation i.e. do warehouse premises come under any kind of regulatory oversight? E.g. does the local council have any influence over what is stored, who tenants are etc.
12. If not, do you think some kind of regulatory oversight is necessary? And if so, who do you think is the best organisation to have control of this and why?
13. Are there any organisations that SEPA could work alongside to reduce illegal disposal of waste in warehouses?
14. In future criminal cases, Landlords might be reported to PF with depositors, would this help?

Annex V – LIFE SMART Waste/Crimestoppers leaflet

Page 1



Page 2

Spot the signs

- Increasing stockpiles of waste
- Increase in lorries entering the site and out of hours activity: at night, weekends & during holidays
- Smoke or foul odours
- Increase in pests, flies or vermin
- Water pollution
- Anonymous operators with no visible entrance sign

Scotland
CrimeStoppers.
0800 555 111
100% anonymous. Always.

www.crimestoppers-uk.org
Crimestoppers Trust is a registered charity. Number SC037960 (Scotland).

Annex VI – Intelligence gathering strategy

INTELLIGENCE GATHERING STRATEGY B15 WAREHOUSING

In order to fully understand the vulnerabilities present in any waste medium, it is important to be able to follow that waste through its life cycle. Previous work carried out by the LIFESMART Waste team shows that waste is vulnerable to criminal exploitation at four key points in its life cycle:

1. Production
2. Transportation
3. Warehousing
4. Disposal

One of the recommendations from Intelligence Report 1 prepared under B11 was to prepare an intervention to tackle warehousing of waste:

‘It is proposed that the following interventions recommendation is progressed through the LSW Project and directly contributes to Action B15: “Set up cross-agency intervention groups & deliver interventions to tackle waste crime issues associated with challenging waste streams”.

Commission an interventions operation in Scotland on unregulated locations, e.g. rented units used for illegal storage of waste.

An initial intervention of tackling the exploitation of rented warehousing units directly supports the current intelligence picture of waste tyres as the priority challenging waste stream in Scotland. The use of such premises to illegally store/dump waste tyres would also appear to be a significant issue across the UK. This is, therefore, considered appropriate as an initial, small scale, intervention operation for the LSW Project in accordance with the Project requirements.’

Under B10 it seeks to undertake investigations to fill intelligence gaps and pilot innovative investigatory tools.

In order to design effective interventions at any of the three relevant levels (operational, tactical and strategic) it is essential to have current, relevant intelligence.

Through LIFESMART Waste initial interventions, warehousing has been selected as a key point vulnerable to criminality through work previously carried out. Whilst all three key points are equally important, time and resources dictate that one key point is piloted to test the model before committing to others.

It is important to note that in recent months several instances of illegal warehousing of waste have come to light in high profile circumstances (Blantyre, Polmadie, Edinburgh) which had significant potential impacts on the environment and Scottish economy and infrastructure.

Purpose of This Paper

The purpose of this paper is to identify intelligence gaps which require to be filled before effective interventions can be implemented.

Regulatory Environment

There is little clarity around which agency has primacy in the regulation of warehousing. Local Authorities have a part to play through planning rates etc. however Landlords also have an input and may be a source of intelligence which can clarify the warehousing picture.

There is no central register of warehouses used for the storage of waste, legal or illegal and little visible regulation of the industry.

There is little clarity around sanctions available for miscreants.

Recommendation:

1. Investigations are carried out with trade bodies to ascertain who has regulatory oversight on warehousing and going forward, who has primacy.
2. All potentially interested agencies (regulatory and non-regulatory) are contacted and asked a series of set questions in order to ascertain picture of the warehousing sector.
3. SEPA should review its enforcement culture and consider where illegal warehousing has occurred and evidence is available, landlords/letting agents should be subject to sanction as being art and part of environmental crime.

Non Regulatory Environment

It has been stated previously that the waste industry is a profitable industry which has not yet fully professionalised. The letting of warehouses (the definition should also include agricultural buildings and storage in the open air) seems to be carried out by a number of different bodies and individuals (factors, letting agents, farmers) and the full picture is as yet unknown to regulators

Recommendation:

1. Contact is made with bona fide letting agents and farming representatives with a view to asking them a series of set questions to ascertain the true scale and intricacies of the warehousing industry in Scotland.
2. Overt contact is made with industry leaders (as yet unidentified) in order to encourage them to self-regulate and form an intelligence network
3. Consideration should be given to commission intelligence tasking with industry participants

Legislative Ambiguity

There is little known about the laws surrounding the warehousing industry by regulators. This in itself leaves it open to criminal exploitation

Regulators seem reluctant to utilise enforcement against landlords, preferring to use them as witnesses

Recommendation:

1. Research is undertaken to ascertain who has primacy in the regulation of warehousing
2. When those agencies are identified they should be encouraged to work in collaboration with other regulators to 'reduce the incidence of warehousing in waste crime'
3. Those agencies should be encouraged to take a robust view of miscreants in their industry Strategic)

Enforcement Environment

SEPA is Scotland's Environmental Regulator. In warehousing we carry out a reactive role, getting involved when an incident occurs or a warehousing issue is eventually uncovered.

Little enforcement action is taken swiftly, often taking months or years before reaching a conclusion. There appears to be a risk averse enforcement culture and a reluctance to take swift executive action. This may be due to a lack of confidence and a lack of training.

Recommendation:

1. Train managers to manage and allow them to manage and take decisions
2. Train staff to investigate thoroughly at all levels in the organisation (IOs and SIOs)
3. Carry out a SEPA wide intelligence engagement strategy to encourage the submission and dissemination of quality intelligence
4. Utilise all legal means to address warehousing, be lawfully audacious

Economic and Market Structure

This is the single most significant threat to economic wellbeing in Scotland in relation to waste. As regulators we are unsighted on economic drivers and market forces, relying on investigative norms to ascertain motive (sex, money power) for environmental crime. We have little knowledge on business models, overheads and margins in warehousing in Scotland.

Recommendation

1. A data collection exercise takes place to identify the main players in the warehousing industry in Scotland
2. Overt enquiries are carried out with these players to ascertain the past/current/future picture in relation to warehousing in Scotland and its vulnerability to criminal exploitation
3. Those interviewed should be considered for intelligence development

Warehousing Vulnerabilities

Little is known about why the illegal warehousing of waste is emerging as an issue. Evidenced guesswork has taken place and concluded that economic downturn, political decisions and European uncertainty all play a part. As regulators, we simply do not know.

Recommendation:

1. Overt interviews utilising set questions take place with those identified as being involved in the legal aspect of warehousing in Scotland
2. Covert interviews take place with those who have been involved as witnesses, suspects/accused in warehousing in Scotland
3. Intelligence tasking should take place to ascertain why warehousing is vulnerable to criminal exploitation

Industry Characteristics

As regulators, we know very little about the waste industry in general and the warehousing aspect in particular. This leaves our communities, environment and national economy vulnerable to criminal exploitation.

Recommendation

1. Overt enquiries are carried out with those involved in the warehousing industry with the aim of obtaining a clearer picture of the industry and its vulnerability to criminal exploitation
2. Economic examination take place to ascertain the scale of the economic impact of illegal warehousing of waste (e.g. undercutting of legitimate landlords, tax lost)
3. Enforcement/intelligence gathering models utilised in other countries are examined to ascertain if we can learn lessons from others.

Environmental Issues

The potential for significant environmental harm in the illegal warehousing of waste is real. Recent incidences of warehousing which have caught fire have shown that major infrastructure including aviation. Whilst actual harm is thankfully rare, community disruption (through flies, vermin etc.), economic disruption (through avoided tax, public purse clearance), loss of community amenity (through visual impact of waste) are sadly all too common.

Recommendation:

1. Adopt a more robust lawfully audacious enforcement culture utilising all legal means to tackle criminality
2. Implement a short, medium and long term media and education strategy which informs the public, operators and owners/managers of their obligations and enforcement implications of non-compliance.

Associated Criminality

Money is a driver in most forms of criminality and waste is clearly seen as an exploitable commodity by criminals. There is little evidence that environmental harm is the aim of criminal

activity in warehousing and the wider waste industry, it appears to be an unfortunate by product of making money.

Recommendation:

1. Adopt a robust intelligence and evidence enforcement culture with the aim of driving criminals out of the waste industry, warehousing in particular
2. Implement a short medium and long term education and media strategy which educates the public and participants in warehousing of their obligations and potential sanctions.

Quality of Monitoring

There is little or no information available as to the extent of criminality in the warehousing of waste, or indeed any aspect of warehousing.

Recommendation:

1. Overt interviews utilising set questions take place with those identified as being involved in the legal aspect of warehousing in Scotland
2. Covert interviews take place with those who have been involved as witnesses, suspects/accused in warehousing in Scotland
3. Intelligence tasking should take place to ascertain why warehousing is vulnerable to criminal exploitation

Collaboration

There is little or no collaboration between regulators in the waste industry generally, with the warehousing aspect in particular. Whilst this is an issue in Scotland, it has significant implications UK wide, where a comprehensive picture of the industry is not clear to any regulator.

There is an opportunity for SEPA and LIFESMART Waste to adopt, pilot and implement a model which tackles vulnerabilities in the waste industry to the benefit of our regulatory colleagues UK and potentially world-wide.

1. Intelligence taskings are carried out and results made available to other regulators
2. The interventions models is evaluated and the finding published for the benefit of all
3. Opportunities are created and exploited for joint agency working with the common goal of reducing the incidence of warehousing in waste crime
4. A short medium and long term media and education strategy are implemented to make all of those involved in warehousing aware of their responsibilities and potential sanctions.
5. A robust enforcement culture is adopted which is lawfully audacious.

Conclusion

There is evidence that environmental crime is the fourth largest crime in the world, costing communities \$91-258 billion per year.

As regulators we need to address the issue, but we cannot do this until we know what the industry is and who is involved in it and thereafter adopt the necessary enforcement culture in order to protect and enhance Scotland's environment.

Annex VII – Briefing note British Insurance Brokers Association

Fly tipping of waste is on the increase throughout the United Kingdom.

The figures involved vary, as does the scale of the problem, but in general terms, there were an additional 50 thousand incidences of fly tipping the UK in 2014/2015 compared to 2013/2014 and the clear up costs increased by £5 million, to £50 million.

An increasing trend has been for criminals to illegally warehouse waste under the guise of sorting or storage then disappear, leaving the landlord or landowner to clear up and bear that cost.

Vacant commercial properties have now become a target for industrial scale fly tipping. Landlords and land owners who are experiencing difficult financial times may be tempted by the prospect of earning rental on an otherwise redundant property.

The reality is more sobering than the promise. Landlords and landowners are being left with significant clear up costs and potential court proceedings through being duped or becoming involved in financial deals which are probably too good to be true.

The Scottish Environment Protection Agency (SEPA), through its LIFE SMART Waste project, teamed up with Crimestoppers and a range of partner organisations in December 2017 to launch a campaign to help tackle the issue of illegal dumping of waste in warehouses and farm buildings.

The new Crimestoppers campaign raises awareness of the issue in Scotland and throughout the United Kingdom and call upon industry, the public, farmers and landowners to take action. Land, property and businesses owners are being alerted to their obligations and responsibilities relating to waste warehousing and storage. The public are being asked to be vigilant and to report suspicious or unusual activity.

Scotland, like England, is seeing an increase in incidents of criminals using warehouses and farm buildings to illegally dispose of large quantities of waste materials. The illegal dumping can result in environmental damage, social disruption and significant cost to our economy. In some cases waste is brought from different areas of the United Kingdom to be dumped in Scotland under the guise of being warehoused, with no obvious cost/benefits analysis being evident.

This has clear implications for landlords, landowners and hauliers as well as insurers.

What farmers/landowners should look out for:

- Increased lorry traffic into warehouses/farm building
- Increased activity at unusual hours
- Increase in foul odours

- Increase in dust/smoke
- Increase in vermin

Waste criminals are elusive and hard to identify as they typically pose as legitimate businesses. They operate throughout the country, offering to remove waste cheaply and then dumping it in empty warehouses, fields or farm buildings. Typically, this is 'challenging' waste that would otherwise be difficult to process or recycle and would possibly go to landfill which would normally incur tax.

What farmers/landowners should be aware of:

1. Anyone who produces, stores and manages waste is obligated to ensure waste does not cause harm to human health or pollution to the environment under waste regulations and Duty of Care legislation.
2. Land and property owners have a responsibility to ensure anyone leasing their land/property complies with regulations. They may be committing an offence by allowing waste to be stored on land or property without the relevant permissions and could leave them liable to prosecution
3. We all have a role to play in protecting our environment by being vigilant and reporting any suspicious or unusual behaviour.

Unlike legitimate waste companies, these rogue businesses are typically unlicensed. They avoid investing in the expensive equipment required to recycle waste and they evade the payment of Landfill Tax, depriving the public of much needed funds. Their lower operating costs give them an unfair competitive advantage that enables them to undercut legitimate operators. Frequently they pay landowners and farmers cash in hand to 'store' their waste and then abandon it, never to be seen again, leaving the farmer/property owner/occupier to face the legal and financial consequences.

The Cost Of Illegal Warehousing

- There are no published statistics on the scale of the illegal waste warehousing problem per se. However, in March 2014, Eunomia estimated that waste crime costs the UK economy £568 million per year⁶. More recently, in an updated version of their report,

⁶ Eunomia (2014) *Waste Crime, Tackling Britain's Dirty Secret*. Online (accessed 21/03/17): <http://www.eunomia.co.uk/reports-tools/waste-crime-tackling-britains-dirty-secret/>

Eunomia estimated that waste crime cost the economy in England alone more than £600 million per year⁷.

LIFE SMART Waste project

- LIFE SMART Waste will tackle the illegal warehousing of waste and undertake a collaborative approach to designing and implementing waste crime interventions. As a key part of the approach, SEPA has brought together and worked with an 'Expert Group' of partner agencies that includes: the Scottish Business Resilience Centre / Scottish Fire and Rescue; Police Scotland; West Dunbartonshire Council; North Lanarkshire Council; Neighbourhood Watch; and Crimestoppers.

- They are also working with NFU Scotland, NFU Mutual, British Insurance Brokers Association, Royal Institution Of Chartered Surveyors, Fleet Transport Association, Traffic Commissioners and other local councils.

- The overall aim is to reduce the incidence of warehousing in waste crime which is a blight on our communities and leaves farmers and landlords vulnerable to legal action, clear up costs and reputational harm.

⁷ Eunomia (May 2015) Rethinking *Waste Crime*. Online (accessed 05/05/17): <http://www.eunomia.co.uk/reports-tools/rethinking-waste-crime/>

Annex VIII– Briefing note National Farmers Union Scotland

The Scottish Environment Protection Agency (SEPA), through its LIFE SMART Waste project, is teaming up with Crimestoppers and a range of partner organisations in December 2017 to launch a campaign to help tackle the issue of illegal dumping of waste in warehouses and farm buildings.

A new Crimestoppers campaign will raise awareness of the issue in Scotland and call upon industry, the public, farmers and landowners to take action. Land, property and businesses owners are being alerted to their obligations and responsibilities relating to waste warehousing and storage. The public are being asked to be vigilant and to report suspicious or unusual activity.

In Scotland we are seeing an increase in incidents of criminals using warehouses and farm buildings to illegally dispose of large quantities of waste materials. The illegal dumping can result in environmental damage, social disruption and significant cost to our economy. In some cases waste is brought from different areas of the United Kingdom to be dumped in Scotland under the guise of being warehoused.

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 at any cost, waste criminals completely disregard the laws that are in place to protect us and our environment.

What farmers/landowners should look out for:

- Increased lorry traffic into warehouses/farm building
- Increased activity at unusual hours
- Increase in foul odours
- Increase in dust/smoke
- Increase in vermin

Waste criminals are elusive and hard to identify as they typically pose as legitimate businesses. They operate throughout the country, offering to remove waste cheaply and then dumping it in empty warehouses, fields or farm buildings. Typically, this is 'challenging' waste that would otherwise be difficult to process or recycle and would possibly go to landfill which would normally incur tax.

What farmers/landowners should be aware of:

4. Anyone who produces, stores and manages waste is obligated to ensure waste does not cause harm to human health or pollution to the environment under waste regulations and Duty of Care legislation.
5. Land and property owners have a responsibility to ensure anyone leasing their land/property complies with regulations. They may be committing an offence by allowing waste to be stored on land or property without the relevant permissions and could leave them liable to prosecution
6. We all have a role to play in protecting our environment by being vigilant and reporting any suspicious or unusual behaviour.

Unlike legitimate waste companies, these rogue businesses are typically unlicensed. They avoid investing in the expensive equipment required to recycle waste and they evade the payment of Scottish Landfill Tax, depriving the Scottish public of much needed funds. Their lower operating costs give them an unfair competitive advantage that enables them to undercut legitimate operators. Frequently they pay landowners and farmers cash in hand to 'store' their waste and then abandon it, never to be seen again, leaving the farmer/property owner/occupier to face the legal and financial consequences.

- A Crimestoppers campaign will commence in in December 2017 with a launch event, including key intervention partners, and a supporting media release.
- A Scotland-wide social media campaign will be undertaken by Crimestoppers starting December 2017. We will share our digital and hard copy assets with non-Police partners and professional representative bodies (e.g. SBRC, NWS, etc.) for further dissemination.
- Crimestoppers evaluation activity will include:

The Cost Of Illegal Warehousing

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⁸ Eunomia (2014) *Waste Crime, Tackling Britain's Dirty Secret*. Online (accessed 21/03/17): <http://www.eunomia.co.uk/reports-tools/waste-crime-tackling-britains-dirty-secret/>

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- They are also working with NFU Scotland, NFU Mutual, British Insurance Brokers Association, Royal Institution Of Chartered Surveyors, Fleet Transport Association, Traffic Commissioners and other local councils.

- The overall aim is to reduce the incidence of warehousing in waste crime which is a blight on our communities and leaves farmers and landlords vulnerable to legal action, clear up costs and reputational harm.

⁹ Eunomia (May 2015) Rethinking *Waste Crime*. Online (accessed 05/05/17): <http://www.eunomia.co.uk/reports-tools/rethinking-waste-crime/>

Annex IX – Media coverage for Crimestoppers campaign

Crimestoppers media engagement generated the following coverage.

Table 2 - Crimestoppers media coverage

Date	Publication	Headline	Summary	Media	AE Value"	Reach
11/12/17	Paisley Daily Express	Help stop illegal waste disposal	People in Renfrewshire are being asked to help in the fight against illegal waste being dumped. Crimestoppers say crooks are using warehouses and farm buildings to get rid of large quantities of waste. The independent charity says illegal dumping can devastate the local environment and cost the Scottish economy. Angela Parker national manager for Crimestoppers in Scotland said: "This is ...	UK Additional Regionals	£ 267	4,800
08/12/17	Press and Journal	Campaign targets waste dumping in countryside	A new campaign encouraging members of the public to anonymously report illegal dumping of waste in farm buildings and warehouses was launched yesterday by Crimestoppers. The campaign, run in partnership with environment agency Sepa, aims to tackle the increase of criminals using warehouses and farm buildings to dump their waste. According to Crimestoppers, waste criminals operate across Scotland's cities and ...	UK Key Regionals / Internet	£ 3,992	7,867
05/12/2017	The Courier (Main Edition)	Bid to halt criminal dumping	A new campaign encouraging members of the public to anonymously report illegal dumping of waste in farm buildings and warehouses was launched yesterday by Crimestoppers. A campaign, run in partnership with environment agency Sepa, aims to tackle the increase in criminals using warehouses and farm buildings to dump their waste. According to Crimestoppers, waste criminals operate across Scotland's cities and ...	UK Key Regionals	£ 3,489	10,554
09/12/17	The Scottish Farmer (Web)	Illegal dumping in farm buildings is on the rise	CRIMINALS are using Scottish farm buildings and warehouses to illegally dispose of large quantities of waste ...	Internet	£ 88	3,263
06/12/2017	Stirling Observer & Shopper	Anonymous calls can help stop illegal dumping of waste	A campaign to encourage the public to report instances of illegal waste dumping in warehouses was at Bandeath Industrial Estate IN THROSK on Monday. It aims to tackle the increase in criminals using warehouses and farm buildings by asking the public to spot the signs and contact the charity anonymously. Waste criminals operate across Scotland's cities and countryside, offering to remove ...	UK Additional Regionals	£ 736	2,342
06/12/2017	Cumnock Chronicle p12 News	Call up to help stop	RURAL and industrial areas are being targeted by illegal dumpers. The Crimestoppers charity has launched a campaign encouraging the public and waste industry to speak up anonymously about illegal waste dumped in	UK Additional Regionals	£ 325	3,948

Date	Publication	Headline	Summary	Media	AE Value"	Reach
	[Circ. 3948]	illegal dumping	warehouses and farm buildings. Illegal dumping is a danger to life and health, can devastate the local environment, disrupts the lives of residents and rural communities. The campaign,			
11/12/17	Paisley Daily Express	You can join the war on waste dumpers	People in Renfrewshire are being asked to help in the fight against illegal waste being dumped. Crimestoppers say crooks are using warehouses and farm buildings to get rid of large quantities of waste. The independent charity says illegal dumping can devastate the local environment and cost the Scottish economy. Angela Parker, national manager for Crimestoppers in Scotland, told the Paisley ...	UK Additional Regionals	£ 264	4,800
09/12/17	Scottish Farmer p7 News	Farm buildings used for illegal dumping	CRIMINALS are using Scottish farm buildings and warehouses to illegally dispose of large quantities of waste, prompting the launch of a new campaign encouraging the public and waste industry operators to speak up anonymously about such illicit dumping sites. According to the campaign, being launched by the Crimestoppers charity in partnership with SEPA, the criminals involved are elusive and hard ...	Magazines Trade & Overseas	£ 660	16,098
14/12/17	The National – P12 News	Call to help stop illegal dumping of waste in warehouses	MEMBERS of the public are being asked to report any suspicions they might have surrounding the growing problem of illegal dumping of waste in warehouses.	UK Additional Regionals	N/A	N/A
15/12/17	Dunoon Observer	Illegal dumping of waste	A CAMPAIGN was launched last week by independent charity Crimestoppers asking the public to speak out about illegal dumping of waste on farms and warehouses.	UK Additional Regionals	N/A	N/A
15/12/17	Ellon Advertiser p2 News [Circ. 15,000]	Campaign looks for help to stop illegal waste dumping	CRIMESTOPPERS'are urging the public to speak up anonymously against illegal waste dumping in warehouses. In Scotland, criminals are using warehouses and farm buildings to illegally dispose of large quantities of waste. Illegal dumping is a danger to life and health, can devastate the local environment, disrupts the lives of residents and rural communities and costs the Scottish economy. The campaign ...	UK Additional Regionals	£ 170	15,000
-	West Lothian Courier	Crackdown on tipping	Marjorie Kerr Crimestoppers is encouraging the West Lothian public and waste industry to speak up anonymously about illegal waste. The move is part of a national campaign and highlights that in Scotland, criminals are using warehouses and farm buildings to illegally dispose of large quantities of waste. Illegal dumping is a danger to life and health, can devastate the local ...	UK Additional Regionals	£ 1,579	6,410

Date	Publication	Headline	Summary	Media	AE Value"	Reach
22/12/17	Inverurie Advertiser p7 News [Circ. 15,000]	Campaign looks for help to stop illegal waste dumping	CRIMESTOPPERS are urging the public to speak up anonymously against illegal waste dumping in warehouses. In Scotland, criminals are using warehouses and farm buildings to illegally dispose of large quantities of waste. Illegal dumping is a danger to life and health, can devastate the local environment, disrupts the lives of residents and rural communities and costs the Scottish economy.	UK Additional Regionals	£ 179	15,000
28/12/17	Glasgow South and Eastwood Extra (Web)	Illegal waste dump cleared	Illegal waste dump cleared : Communities across East Renfrewshire were earlier this year plagued by a fly infestation caused by the illegal dumping of waste at Netherplace Dye Works site near Newton Mearns. In April, the Scottish Environment Protection Agency launched an investigation in response to reports from members of the public about nuisance flies. Over 1,500 tonnes of ...	Internet	£ 100	3,723
-	Turriff Advertiser	Campaign looks for help to stop illegal waste dumping	CRIMESTOPPERS are urging the public to speak up anonymously against illegal waste dumping in warehouses. In Scotland, criminals are using warehouses and farm buildings to illegally dispose of large quantities of waste. Illegal dumping is a danger to life and health, can, devastate the local environment, disrupts the lives of residents and rural communities and costs the Scottish economy.	UK Additional Regionals	£ 161	15,000
-	Executive Magazine (Inverness)	Tip-offs required about tipping Help catch waste gangs	A CRACKDOWN on the use of warehouses as illegal waste dumps has been launched by charity Crimestoppers with a call for the public and waste industry to help halt the dangerous practice. Criminals across Scotland are using ...	Magazine, Business	£ 431	8,212
12/12/17	CIWM Journal Online	Partnership To Tackle Illegal Waste Warehousing In Scotland	LIFE SMART Waste has partnered with Crimestoppers and a range of organisations to launch a campaign to help tackle the issue of illegal dumping of waste in warehouses and farm buildings in Scotland.	Internet	N/A	N/A
		TOTAL			£ 12,442	117,017

Annex X – SEPA digital media

Table 3 - SEPA digital media

Channel	Link	Description / image	Issue date	Reach	Total engagement*
Social media	FaceBook	Link to CS media release on SEPA web site.	04/12/17	2,190	87
Social media	Twitter	Link to CS media release on SEPA web site.	04/12/17	18,000+ followers 7,680 impressions	145
Social media	LinkedIn	Link to CS media release on SEPA web site.	04/12/17	6,100+ Followers	25
Web site	LSW News	LIFE SMART Waste project web news article (analytics for 01/12/17 – 31/03/18)	04/12/17	321 users	399 page views
Web site	Media centre	Crimestoppers media release uploaded to SEPA media centre.	04/12/17	226 users	338 page views
E-newsletter	SEPA Update	News feature in SEPA's weekly e-newsletter to interested stakeholders (public, industry and media representatives)	06/12/17	2,997 subscribers	N/A
Social media	Twitter	Link to CS campaign web page.	12/01/18	18,000+ followers 2,974 impressions	34
Social media	FaceBook	Link to CS campaign web page.	12/01/18	1,742	32
Social media	FaceBook	Link to CS campaign web page.	18/01/18	1,440	19
Social media	Twitter	Link to CS campaign web page.	18/01/18	3,442 impressions	30
E-newsletter	NetRegs	News feature in NetRegs monthly e-newsletter to industry representatives (Scotland).	20/12/17	4,442 subscribers	N/A

* Total number of post clicks, shares, likes, etc.