Smarter regulation of waste in Europe

LIFE SMART Waste (LIFE13 ENV-UK-000549) is a five-year project that commenced in June 2014 with the aim of demonstrating innovative ways of understanding, tackling and reducing waste-related crime.

Waste crime continues to be a serious issue. Waste criminals are elusive and persistently profit at the expense of our environment, economies and communities in Europe and beyond. The issue of waste crime is also widely recognised as a major threat to our ambitions of a circular economy.

The LIFE SMART Waste project was initiated by SEPA in recognition that there are significant gaps in our collective understanding of the causes, dynamics and triggers for criminal activity in challenging waste streams. Closing these gaps offers opportunities to identify and develop practical indicators, deterrents and remedies for such criminal behaviour.

LIFE SMART Waste is undertaking investigations to fill key gaps in our understanding and to generate waste crime intelligence. Project Beneficiaries are working closely with a range of partner organisations and suppliers to design and develop innovative intelligence-gathering tools, techniques and intelligence-led waste crime interventions.

In this publication we provide a broad overview of progress at the mid-point of the project.
Communications Hub

LIFE SMART Waste has been developing an online platform to allow participating enforcement agencies to collaborate in a secure, virtual environment that transcends traditional boundaries and borders. In June 2016, a pilot for the communications ‘Hub’ was launched with the support of a range of external stakeholders.

The launch of the pilot Hub followed an extensive period of design, procurement and initial user acceptance testing for the IBM platform selected. During this process it was necessary to resolve a range of technical challenges encountered with the platform.

Early presentations and demonstrations to potential users generated considerable positive feedback and interest in furthering international collaboration using the Hub. Current participants include representatives from: SEPA, Natural Resources Wales (NRW); NIEA, the Environment Agency (England), INTERPOL’s Pollution Crime Working Group; Associated Beneficiaries; the project’s External Steering Group; and other industry experts.

Although the Hub was not developed as a system for sharing sensitive criminal intelligence, it does offer the potential for online collaborative activity - and the sharing of non-sensitive information - on a daily basis. This functionality is currently being used to help with the development of the project’s intelligence-gathering tools and investigatory work.

Wider deployment of the Hub will be linked to specific collaborative activities to ensure that participants can invest their time efficiently.
Innovative tools, approaches and techniques

LIFE SMART Waste has been engaging with stakeholders and external contractors to scope and develop a range of analytical tools, approaches and techniques. These are intended to enable environmental regulators to identify and tackle the issues which facilitate either criminal behaviours or the criminalisation of the market itself. Currently, the following are in development:

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<th>Financial investigation tool</th>
<th>Horizon scanning tool</th>
<th>Competitive intelligence tool</th>
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<td>The external contractor, Cranfield University, has developed a pilot Financial Investigation Toolkit that helps with the assessment of a range of useful financial indicators - including sources of finance, levels of gearing, variances in costs and income - for regulated sites. The aim of this tool is to help provide regulators with additional insights to identify potential or likely future offending by regulated waste operators. The deployment of a pilot will commence in late summer 2017.</td>
<td>LIFE SMART Waste is working with Cranfield University and expert users to develop an emerging threats and predictive analysis (horizon scanning) tool. Applied to the waste industry and associated markets, this tool should enable environmental authorities to identify where waste criminals might target their efforts in the future. A draft of the tool will be available for review and testing in the second half of 2017.</td>
<td>LIFE SMART Waste is working with a competitive intelligence (CI) specialist, Christophe Bisson, to develop an innovative CI tool for environmental regulators. This tool is intended to help identify those opportunities or vulnerabilities in waste businesses or markets that provide opportunities for competitive advantage through criminal behaviour. A Desk-top Research Report (December 2016) has provided context for the development of a further Framework Report that will clarify the scope of this tool. The delivery of the pilot tool is scheduled for September 2017.</td>
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### Innovative tools, approaches and techniques (Continued)

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<th>Waste flow audits</th>
<th>Waste flow tracking devices</th>
<th>Remote sensing techniques</th>
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<td>Waste flow audits have the potential to identify leakages in waste movements from the point of production to the final destination. To assess this potential, LIFE SMART Waste collected and analysed data from waste operator site visits in Scotland and produced a <em>Waste Crime Indicators Report</em> in October 2016. The audits have proven to be significantly more complex and challenging than envisaged. Consequently, a further pilot project using a waste flow audit approach is under consideration within the investigation and intervention bundles scheduled for 2017 and 2018.</td>
<td>LIFE SMART Waste is investigating the potential for using tracking devices in innovative ways to follow the movements of different types of waste within Scotland and Wales. Both practical and legal challenges are being considered. Contingent on legal advice for Scotland and Wales, work on a feasibility report, and scoping for the pilot project, is well underway in collaboration with experts from Police Scotland. The feasibility study is anticipated for completion by Quarter 4 2017 ahead of a possible deployment of the pilot.</td>
<td>LIFE SMART Waste is working with external contractors, Cambreensis and Air and Space Evidence, to develop, pilot and evaluate innovative remote sensing techniques for gaining intelligence on illegal activities associated with ‘challenging’ waste streams (such as illegal stockpiling, land application and land-fill). Work on a Phase 1 desk-top research report, to identify applications in tackling environmental and waste crime, commenced in December 2016. The piloting of innovative techniques and approaches is scheduled to start in summer 2017.</td>
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Investigations and intelligence

In line with the project’s Intelligence Gathering Strategy (completed September 2015), LIFE SMART Waste is undertaking investigations to fill gaps in understanding and generate waste crime intelligence.

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<th>Investigations</th>
<th>Intelligence reports</th>
<th>Barriers to joint working</th>
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<td>LIFE SMART Waste has completed two of four planned investigation bundles. The first investigation was a survey of Waste industry perceptions of waste crime in Scotland, undertaken in July 2016, to understand the nature of waste crime and provide a baseline of the scale of the problem. The second investigation, undertaken in June 2017, was a follow-up survey focusing specifically on the vulnerability of the Waste Tyres sector to criminal activity.</td>
<td>The first of four planned intelligence reports was completed and approved in December 2016. Intelligence Report No.1 reviewed SEPA and NRW waste intelligence for 2015-2016 and identified top priority issues for intervention and investigation relating to: warehousing; and waste hauliers. Consequently, the issue of unregulated rented warehousing units being exploited for illegal waste activities will be addressed in the first cross-agency intervention. Each of the intelligence reports produced will be used to inform subsequent cross-agency interventions.</td>
<td>In consultation with a range of external stakeholders, LIFE SMART Waste has published two reports on barriers to joint working between agencies on interventions to tackle waste crime. The first report (December 2015) identified a range of barriers as a first step towards overcoming them. The second report (August 2016) reviewed and evaluated the requirements for designing effective intervention group partnerships.</td>
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Interventions and policy recommendations

LIFE SMART Waste is using the emerging insights and intelligence gathered to apply an intelligence-led approach to the design of interventions targeting a selection of vulnerable waste streams. These interventions will offer opportunities to pilot and refine the project’s innovative investigatory tools and will inform a series of policy recommendation reports.

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<th>Intervention Design Manual</th>
<th>Cross-agency interventions</th>
<th>Policy recommendation reports</th>
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<td>LIFE SMART Waste has created an innovative <em>Intervention Design Manual</em> for tackling waste crime. In consultation with SEPA, NRW and external stakeholders, an initial version was delivered by the external contractor, Cambrensis Limited, in April 2016. The aim of the manual is to provide European environmental authorities with a framework for choosing and designing interventions, and making intervention agreements with partners. The Intervention Design Manual will be piloted in the project’s first intervention in 2017 to help create a package of interventions unique to the specified problem.</td>
<td>LIFE SMART Waste is using project’s insights to set up cross-agency intervention groups and using newly-developed tools to design three innovative intelligence-led interventions. The intervention groups will be built on existing collaborations with enforcement agencies and industry bodies and will use approaches established by such organisations as INTERPOL, Europol and IMPEL. This new approach will be tested in the first joint intervention, which focuses on the issue of unregulated rented warehousing units being exploited for illegal waste activities. The results are anticipated by Summer 2017.</td>
<td>On completion of cross-agency interventions, LIFE SMART Waste will produce three policy and legislative intervention recommendation reports. These reports will specifically identify and recommend interventions and changes to help tackle crime associated with challenging waste streams. The key recommendations will be summarised in EU briefing papers for circulation to relevant European institutions in early 2019.</td>
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Engagement and dissemination

To maximise the opportunities for collaboration, a significant amount of time has been invested in engaging with and disseminating to key stakeholders.

LIFE SMART Waste has reached out to EU enforcement agencies and industry representatives to make them aware of the project and to encourage their involvement. The project has successfully engaged with both environmental and non-environmental enforcement agencies – including police, customs and financial authorities - in the scoping and development of intelligence products, investigatory tools, and intervention designs. LIFE SMART Waste has also engaged with key professional bodies and networks - including IMPEL and the CIWM – and made links with a range of projects addressing the issue of waste crime in Europe and beyond, including: EFFACE; TECUM; BlockWaste; DOTCOM Waste; and LIFE-ENPE.

Engagement with EU policy maker and legislator stakeholders commenced early in the project and will become increasingly important as the project presents its findings and seeks to influence European policy and legislative changes. Engagement is ongoing and has to-date focused on engagement with representatives of: UK devolved governments; non-ministerial departments of the UK and Scottish Governments (HMRC and Revenue Scotland); and the European Commission DG Environment (Governance). Project updates have also been routinely shared with the ACR+ international network of local and regional governments.

LIFE SMART Waste has been actively disseminating project news and updates to wider stakeholders at events and using digital media channels. A project web site was created to provide a combination of background information, project news and access to project publications (brochures, reports and supporting information). A selection of social media channels (Twitter, FaceBook and LinkedIn) are being used to share news and a project e-newsletter is routinely issued to a growing database of interested parties throughout Europe and beyond.

Find out more

- Web  www.lifesmartwaste.com
- E-newsletter  Registration form

Contact us to get involved

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