

Waste Crime & Digital Waste Tracking



CIWM



CIWM
South West

11 November 2025 | www.ciwm.co.uk

Housekeeping

- Please type any questions you have for the speakers in the Q&A section (located in the bar at the bottom of your screen).
- We ask that all questions/ comments are respectful to the speakers.
- If you are having viewing problems, click the option to launch Zoom Webinar in a new window.
- The session recording will be available to view via the CIWM Knowledge Centre.
- For more information on CIWM and becoming a member, please visit our website - www.ciwm.co.uk



Agenda

10:00 – Welcome & Introductions

Sarah Ottaway, CIWM SW Regional Committee Chair and Sustainability & Social Value Lead, Suez

10:05 – Lost Opportunities

Dr David Greenfield, CIWM President & Managing Director, SOENECS

10:20 – Waste Crime – political engagement at last?

Dr Anna Willetts, Co-Convener, UK Environmental Law Association Waste Working Party

10:35 – Clean Devon Partnership: Working together to tackle litter and fly tipping

Annette Dentith, Principal Waste Manager, Devon County Council

10:50 - 11:05 – BREAK

11:10 – Defra Digital Waste Tracking Implementation Update

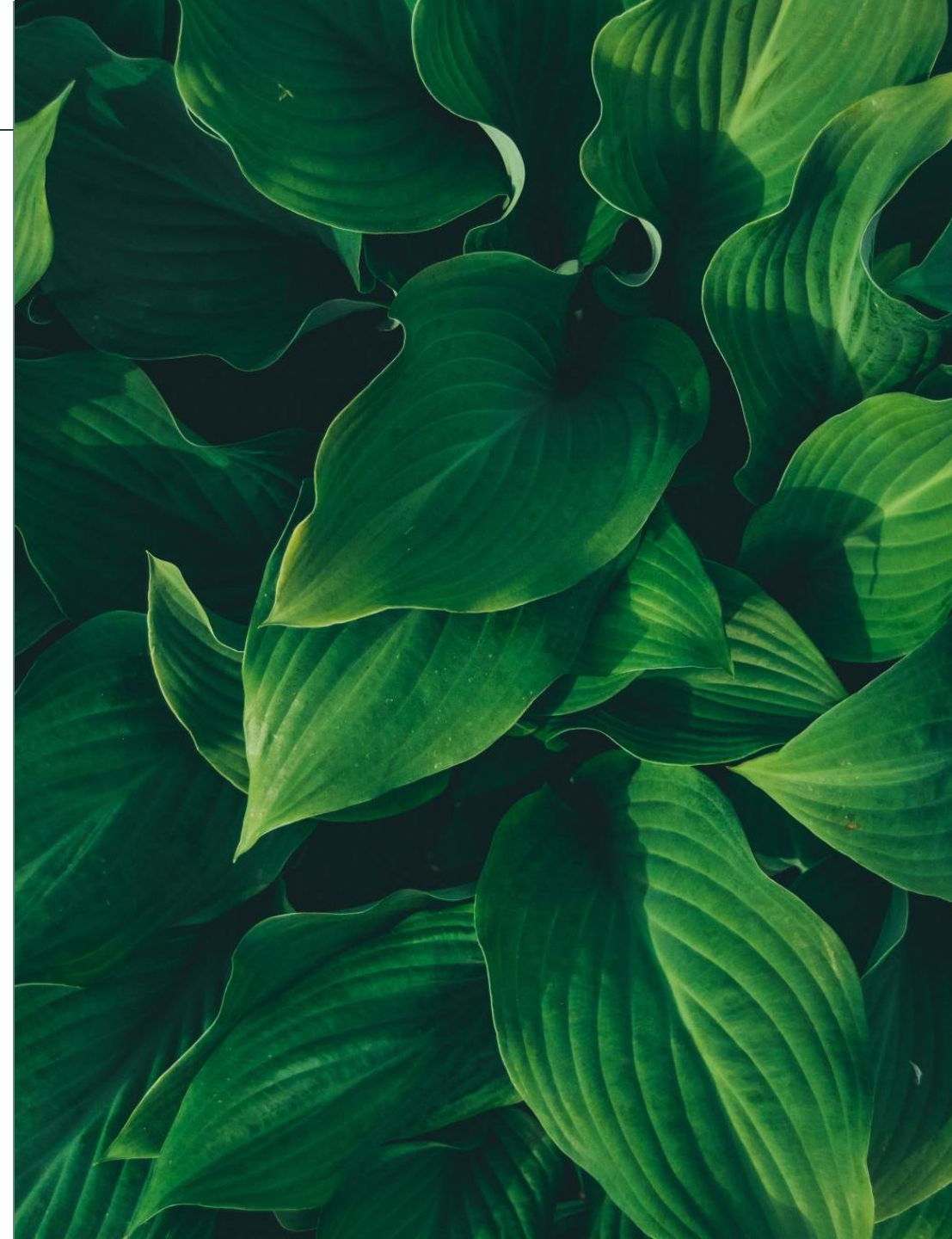
Lorraine May, Policy Lead (England), DEFRA (Department for Environment, Food & Rural Affairs)

11:25 – Digital Waste Tracking: Using Rubbish Data to Unlock the Circular Economy

Sophie Walker, CEO and Co-Founder, Dsposal

11:45 – Panel Discussion and Q&A

12:20 – SW Regional Update





Dr David Greenfield

*CIWM President; Managing Director,
SOENECS*



gunnercooke

Waste Crime - political engagement at last?

CIWM South West Regional Committee

11 November 2025

Dr Anna Willetts, Partner, gunnercooke llp



What will this session cover?

- Recent House of Lords Inquiry
- Outcomes and letter to government
- Coffee-gate
- Packaging-gate



Lords call for independent review of “broken” system over waste crime

- Committee has written to Defra outlining that criminality is endemic in the waste sector yet and organised criminal gangs are exploiting weak enforcement, soft penalties and regulatory failures to make millions at the expense of the environment, communities and legitimate operators.
- Also raised concerns that proposed changes to Landfill Tax, which include a shift to a single rate, could inadvertently drive further criminality by encouraging the abandonment of landfill sites and illegal dumping. Additionally, peers condemned the lack of criminal prosecutions for Landfill Tax fraud, noting that, despite a 22 per cent “tax gap”, no one has ever been convicted and that, as such, “Landfill tax fraud has been effectively decriminalised”.

- Committee set out a detailed list of recommendations aimed at overhauling policy and regulation around waste crime. Their principal recommendation is for an independent “root and branch” review of the system — spanning Defra, the Environment Agency, HMRC, the police and local authorities — to report by May 2027. This review should, they said, deliver a roadmap for reform.
- Maintaining the additional funding given to the Environment Agency this year; reviewing Treasury rules that prevent the regulator from using certain funds to tackle crime; implementing the previously proposed waste crime levy on permitted sites and ensuring that any landfill tax reforms are fully assessed to prevent unintended consequences. Peers also pressed ministers to deliver long-promised reforms to the licensing of waste carriers and to roll out mandatory digital waste tracking without delay — which are long overdue and would represent a quick win if appropriately resourced; implemented correctly and effectively enforced.

Response

“It is completely untrue that we prioritise compliance over non-compliance. That is a complete misreading of the situation.”



Cases – waste crime?

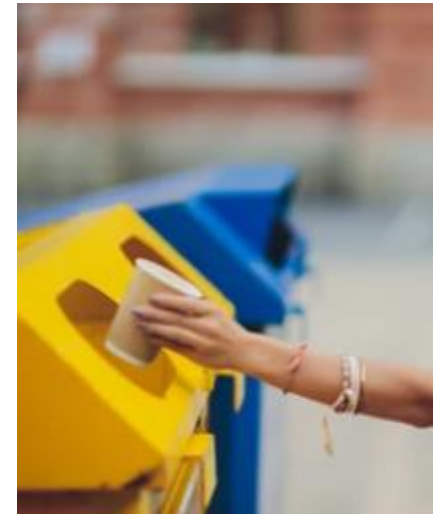
- Skip hire business serving local authority for 19 years. EA found 14 waste transfer notes were incorrectly completed. Prosecuted, 4 hours of Court time utilised, unknown hours of EA time, £500 fine.
- EA prosecuted 5 defendants for conspiracy to commit fraud in respect of a battery recycling scheme – potential for up to 7 years' custodial sentence. Defence pushed for disclosure all the way through the case. EA continually resisted. Eventually Judge forced them to supply it (after Jury sworn in). Thousands of documents indicating hidden evidence, missing/lost evidence, changing witness statements etc. EA had to withdraw the case and all defendants acquitted. Hours of Court time and Jury time incurred. Our client, who was not entitled to legal aid, spent over £115,000 in legal fees, as did one other defendant.

Cases - waste crime?

- Client (reputable haulage business) deposited 1400 tonnes of soil/aggregates in a field at landowner's request to build a motocross track. Exemption permitted 1000 tonnes. Prosecuted for knowingly causing illegal deposit of waste. Offered EU (12K payment to local charity and full costs to EA). Rejected. EA says it's so serious it must be prosecuted
- Transport Manager included in charges against two Directors. Summons issued 5 years after interviews. Witness statement of EA officers did not correspond with notebooks from the site visits in question. No mention of our client during any site visit in the notebooks yet witness statement drafted 5 years later placed our client at the scene. Abuse of Process argument in the Crown Court which was successful and the matter against our client dropped. Cost our client £6000+ in legal fees, EA time and resources, and Court time

Coffee-gate

- **The incident:** A woman poured the remainder of her coffee down a drain while waiting for a bus, a minor action she took to avoid spilling it on herself
- **The fine:** Enforcement officers issued a £150 fine, stating her action violated the Environmental Protection Act 1990, which prohibits disposing of waste in a manner that could pollute land or water
- **The reversal:** Following public outcry, the council reviewed the case and canceled the fine, apologizing for any upset. The council acknowledged that while the fine was technically justified, it was likely the woman's appeal would have been successful
- **The aftermath:** The incident sparked debate about the harshness of the penalty and led the council to state it would review its public guidance on the disposal of liquids in public space



Packaging-gate

BINNED OFF

Mum faces massive £5,000 fine for putting packaging in park bin because it wasn't 'public litter'

The mum from North Wales now faces prosecution from Flintshire council. The environmental enforcement team asked her to attend an “interview under caution” under the Environmental Protection Act 1990.

“ The Council is always complaining it has no money yet it can afford to do this.’

The council said she could bring her own solicitor to fight the case. But Natasha, who is a full-time carer for her 13-year-old child with additional needs, said she can't afford one.

Digital Waste Tracking – the answer?



Thank you for listening!

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Clean Devon Partnership

Working together to tackle litter and fly tipping

Annette Dentith
Principal Waste Manager
Devon County Council



Scope

- Clean Devon Partnership – who are we?
- What do we do?
 - Business Plan and Action Plan
 - Best practice research
 - Events
 - Campaigns
 - CCTV
 - Links to others
- What is more difficult?
- Funding



Clean Devon Partnership – who are we?

- Collaboration between:
 - Local Authorities including town and parish councils
 - National Parks
 - Police and OPCC
 - EA
 - NFU and CLA
 - Business groups
 - Devon Wildlife Trust
 - National Highways
 - CPRE
 - Trading Standards
- 5 task groups



What do we do? – Strategy and advice

- Business Plan
- Action Plan
 - Highway litter management coordination
 - Centralised mapping system
 - Hotspot identification
 - Dog fouling campaign
- Best practice
- Website www.cleandevon.org



Clean Devon - Themes & Priorities

Themes and Priorities – 2025 to 2027

We have agreed the following main **themes and priorities** for the term of this Business Plan.

1. **On-the-go and vehicle littering**
2. **Dog fouling**
3. **Waste Crime Surveillance**

Action Plan Summary

Supporting our themes and priorities, this **Action Plan Summary** includes some highlights from our 'task group' actions.

Task Group (TG)	Action
TG1 Compliance	<ol style="list-style-type: none">1. Explore opportunities for a Partnership waste crime surveillance resource2. Consider the merits of consistent waste crime policy3. Explore the adoption of Partnership ISA to share intelligence
TG2 Operations	<ol style="list-style-type: none">1. Assess options for Partnership wide 'think litter' policies2. Agree a Partnership approach for a Community Volunteer Strategy3. Assess options for inclusion of Duty of Care in Planning Conditions
TG3 Business	<ol style="list-style-type: none">1. To engage with Business groups and partnerships to promote Clean Devon2. Consider targeted promotion of Duty of Care to businesses
TG4 Landowners	<ol style="list-style-type: none">1. Encourage landowners to report fly tipping on private land2. Produce a Clean Devon guide for landowners3. Highlight options for the safe management of landowner wastes
TG5 Communications	<ol style="list-style-type: none">1. Develop a Partnership Communications Plan2. Deliver a high-profile anti vehicle littering campaign (2025)3. Support and deliver annual campaigns for Litter (spring) and fly tipping (autumn)

If you want to find out more about Clean Devon, support our work, or have a question or suggestion, [contact us](#)

Thanks for your support, together we have the power to make Devon litter-free.



Take only pictures
Leave only footprints



Best practice research

- Private landowners
- Central Mapping
- Enforcement and waste crime strategy
- Interventions
- Surveillance
- Campaigns
- Community Litter Strategy



Events and campaigns

Activities: Fake Fly Tips –
Police/LA taking the initiative

Events: e.g County Show,
Croyde Beach, DALC
conference

Campaigns: to coincide with
GBSC, GBBC, Lend a Paw,
Rural Crime Week



Clean Devon Roadside Litter Campaign 2025

- Campaign duration: 24 Mar – 20 Apr
- Across multiple platforms with targeted awareness to include media consumed whilst in vehicles: Spotify
- To raise awareness across rural routes with hedgerows
- Reaching key audience groups with higher intent towards littering
- Those who spend longer driving/commuting including van drivers, trades & younger demographics
- Media platforms included Facebook, Instagram, TikTok, Snapchat
- Videos created for You Tube



Clean Devon Roadside Litter Campaign 2025

**ROADSIDE
LITTER KILLS
3 MILLION SMALL
ANIMALS EVERY YEAR!**

Take your rubbish home



Clean Devon Roadside Litter Campaign 2025



Bus Back images

Out Of Home

Bus Backs - 17 Mar - 14 Apr

Reached into rural areas with 20 x lower rear bus backs.

Routes including:

Exeter (x10)

Torquay (x6)

Barnstaple (x4)

Overshow campaign extended beyond end date



Clean Devon Roadside Litter Campaign 2025

- High reach through engaging video content directing 10,300 users to the website landing page
- 902,000 video views
- 1.6 million digital ad impressions
- Numerous mentions of bus backs noted
- All in all a well received campaign
- Further detail available on request

Fake Fly Tips



What do we do? - CCTV and signage

- CCTV – different cameras and signs being trialled – Vipa, Guard my

Flytipping?
You never know who's watching.



Flytipping is a criminal offence.
Fines up to £50k, jail up to 5 years.
See it, Report it - 0800 555 111

ATTENTION

Protecting
our environment



**CCTV cameras
may be in
operation in
this area**



Wider partners and useful contacts

- Devon and Cornwall Rural Crime Team
 - working together to reduce crime and anti-social behaviour in towns, coastal and countryside areas, roads, homes and neighbourhoods
- Dartmoor Rural Crime Initiative
- Waste Crime Wednesday – EA Social media
- National Fly Tipping Prevention Group
- Local Nature Partnership
- National Highways Litter Task Force
- Clean Cornwall
- National Trust
- Community Safety Accreditation Scheme (CSAS)



What is more difficult?

- Intelligence Sharing Agreements
- Highways – e.g. litter confetti issue
- Helping Landowners
- Making reporting simple and understood
- Dog fouling
- CCTV implementation



Gradings

Acquisition		Exploitation
SOURCE	INTELLIGENCE	HANDLING
1. Reliable	A. Known Directly	P. Lawful Sharing Permitted
2. Untested	B. Known indirectly but corroborated	
	C. Known Indirectly	C. Lawful Sharing Permitted with Conditions
3. Not Reliable	D. Not Known	
	E. Suspected to be False	



Funding

- Devon Authorities Strategic Waste Committee
- In kind – time, communications team, knowledge
- Sponsorship? E.g. laybys?
- OPCC?



House of Lords Inquiry into waste crime

- Critical of EA and Police
- Recommendations:
 - Improve collaboration between bodies responsible for waste crime at a local level especially policing and local government
 - Single phone number and online reporting tool
 - Defra to set targets





Break

We'll be back live at 11:05!





Department
for Environment,
Food & Rural Affairs

Digital waste tracking – Implementation update

November 2025

Background refresh

What is the digital waste tracking service intended to do?

- Enable the tracking of all household, commercial and industrial waste (controlled waste) whether it is hazardous or non-hazardous
- Ultimately digital waste tracking records will replace existing waste transfer notes, hazardous waste consignment notes and Annex VII documentation for exports
- Digital waste tracking records will have unique numbers assigned to them. Those involved in the waste movement will use the ID number to view details about the waste and to submit information regarding their involvement in the waste movement. Waste producers will be able to use the unique ID to see where their waste has been taken.

Scale of the project

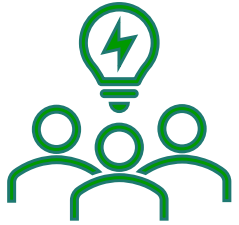
- The waste industry involves a large number and complex array of operators, including approximately:

- 12,000 waste site operators
- 150,000 registered waste exemption holders
- 300,000 registered waste carriers, brokers and dealers

These work across a wide variety of sectors and have varying levels of digital capability

Through the introduction of digital waste tracking and the increased oversight and transparency it will provide; we want to significantly decrease the opportunities for those who flout the processes and undercut legitimate waste businesses

Project reset



Testing revealed issues with the original approach:

Manual entry on GOV.UK was too cumbersome

CSV uploads were clunky and inefficient

Unexpected demand for an API from users

Needed a more scalable, user-friendly solution

Exploring Better Options

Reviewed similar systems in other countries

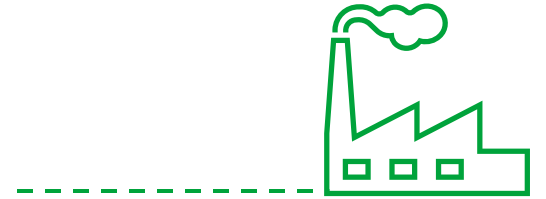


Assessed feasibility of an API-first model



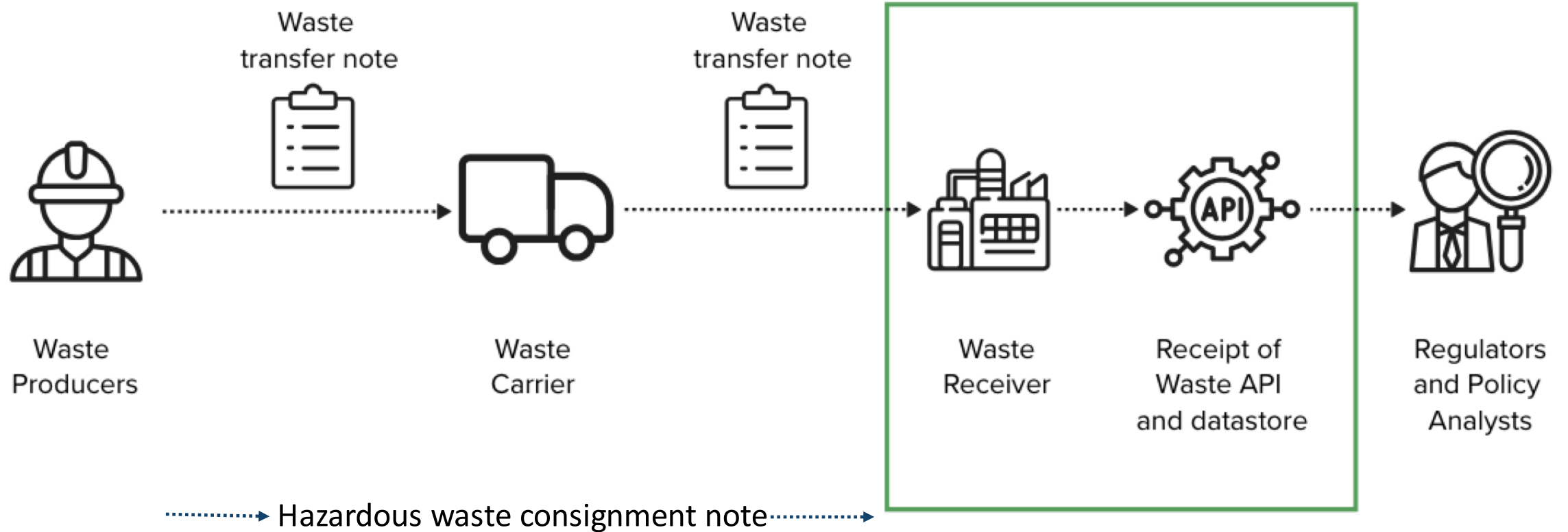
Conducted user research with a range of companies

Project reset



- July 2025 – announced new phased approach to implementation
 - Phase 1 will focus on permitted receiving sites entering information about waste being received. Mandatory from October 2026
 - Phase 2 (subject to funding) is planned to expand this to the rest of the waste movement chain and exempt receiving sites from 2027
 - Transfer notes and consignment notes will continue in Phase 1
 - API focussed approach - means those with existing commercial software can still carry on using that but an API will be integrated so that the relevant information gets transmitted to the digital waste tracking system without too much change to business processes.
 - Secondary option for those without commercial software being tested for feasibility
-

Receivers only – from October 2026




For more info



- Webinars were held in July regarding the change in approach – Watch the recording on our [YouTube](#) channel.
- Q&A – questions received on the webinars have been answered and published in September's Circular Economy newsletter. To sign up and access past editions of the newsletter go [here](#)



Current position

- Legislation across the 4 nations being completed – on track
- Software providers being engaged
- API specification has been published along with data fields
- All up to date info can be found on GitHub page [Defra digital waste tracking](#)
- Big focus on sign ups for private beta – private beta testing to start very soon: [Sign up for our Digital Waste Tracking Private Beta test](#)
- Currently testing feasibility of the secondary option with operators from user panel
- User research for Phase 2 starting soon
- Co-design working group monthly meetings

GitHub is an online platform that helps teams work together on projects in an organised way. It keeps a record of every change, so nothing gets lost, and everyone can see what's happening.


Defra digital waste tracking



Search

Defra digital waste tracking
About digital waste tracking
[Service vision - storyboards](#)
[Service vision - process diagram](#)
[Initial scope - receivers only by October 2026](#)
[Receipt of Waste - process diagram](#)
[Receipt of Waste - data requirements](#)
[Receipt of Waste - draft API specifications](#)
[Receipt of Waste - API authentication flow](#)
[Receipt of Waste API - frequently asked questions \(FAQs\)](#)
[API testing and Examples](#)
[Receipt of Waste API - Roadmap](#)
[Apply to test the service in beta](#)

Apply to test the service in beta

About the private beta

A private beta is a way of testing a service or product with a select group of chosen users to gather feedback and iron out any issues during the development.

Our aims are to:

- help software developers and waste receivers prepare for the mandatory changes to the reporting of waste movements (coming into effect from October 2026)
- give software developers (including third-party and internal development teams) as much time as possible to integrate their products and systems with the [Defra Receipt of Waste API](#)
- test that our APIs, processes and documentation meet the needs of waste receivers and software developers
- ensure the data we collect meets the needs of waste regulators
- test and refine our registration, onboarding and support processes

Who can take part in the private beta

To be eligible to take part, your organisation must:

- operate one or more licensed or permitted waste receiving sites in the UK
- be able to work with your external software developers or internal development team so you can provide data about the waste you receive via the [Receipt of Waste API](#)

Defra digital waste tracking  [GitHub](#) ☆ 7 ♡ 3

Defra digital waste tracking

About digital waste tracking

Service vision – storyboard

Service vision - process diagram

Initial scope - receivers only by
October 2026

Receipt of Waste - process diagram

Receipt of Waste - data requirements

Receipt of Waste - draft API specification

Receipt of Waste - API authentication Note

Receipt of Waste API - Frequently asked questions (FAQs)

API Testing and Examples

Receipt of Waste API - Roadmap

[Apply to test the service in beta](#)

Service vision – storyboard

[illegible]


 Receipt of Waste - draft API specification
 
 Search
 
[GitHub](#)
 7
  3

Defra digital waste tracking

About digital waste tracking

Service vision – storyboard

Service vision - process diagram

Initial scope - receivers only by
October 2026

Receipt of Waste - process diagram

Receipt of Waste - data requirements

Receipt of Waste - draft API specification

Receipt of Waste - API
authentication Note

Receipt of Waste API - Frequently asked questions (FAQs)

API Testing and Examples

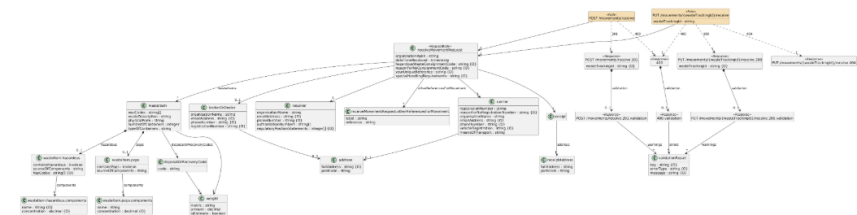
Receipt of Waste API - Roadmap

[Apply to test the service in beta](#)

Draft Open API specifications

The following draft specifications are all published on the Swagger API hub:

- receipt of waste API specification

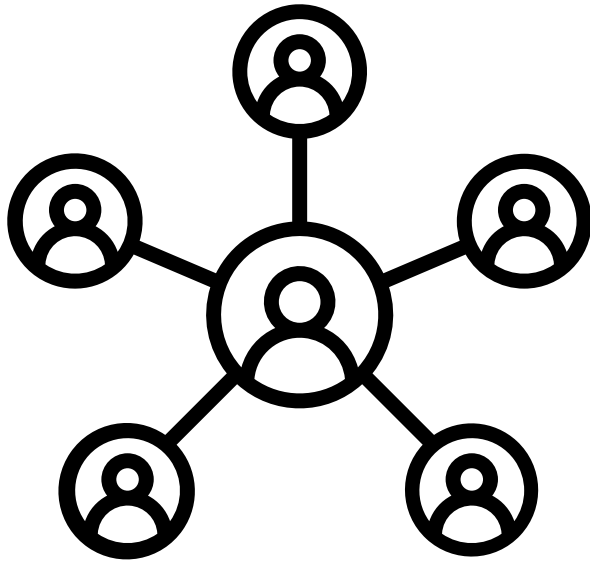


API Change Log

The following page lists all of the changes to the API specification since it was first published:

- receipt of waste API change log

Co-design group



- Monthly meetings began in July
- Representative group of operators across different sectors, different sizes of business, operations in different parts of the UK
- Data fields for Phase 1, POPs fields, Approach to correcting errors in records, Encouraging private beta participation
- We have been sharing meeting summaries with selected trade associations and will be expanding the distribution list to include additional relevant bodies starting this month.
- Will be reviewing participants as we start to progress onto Phase 2 work

Information Links

[Mandatory digital waste tracking - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Introduction of mandatory digital waste tracking - Defra - Citizen Space](#)

[Consultation document Introduction of mandatory digital waste tracking.pdf \(defra.gov.uk\)](#)

[Government response - GOV.UK](#)

[Introduction to mandatory digital waste tracking: summary of proposals \(defra.gov.uk\)](#)

Participation Links

To get involved, please complete our online application form: [apply to voluntarily test the report receipt of waste service.](#)

[Join the Waste Tracking User Panel](#) to help shape the digital service

To keep up to date with Digital waste tracking please subscribe to our full Newsletter using this link: [Get the latest news and updates on the Circular Economy Reforms](#)

[Github waste tracking page](#)



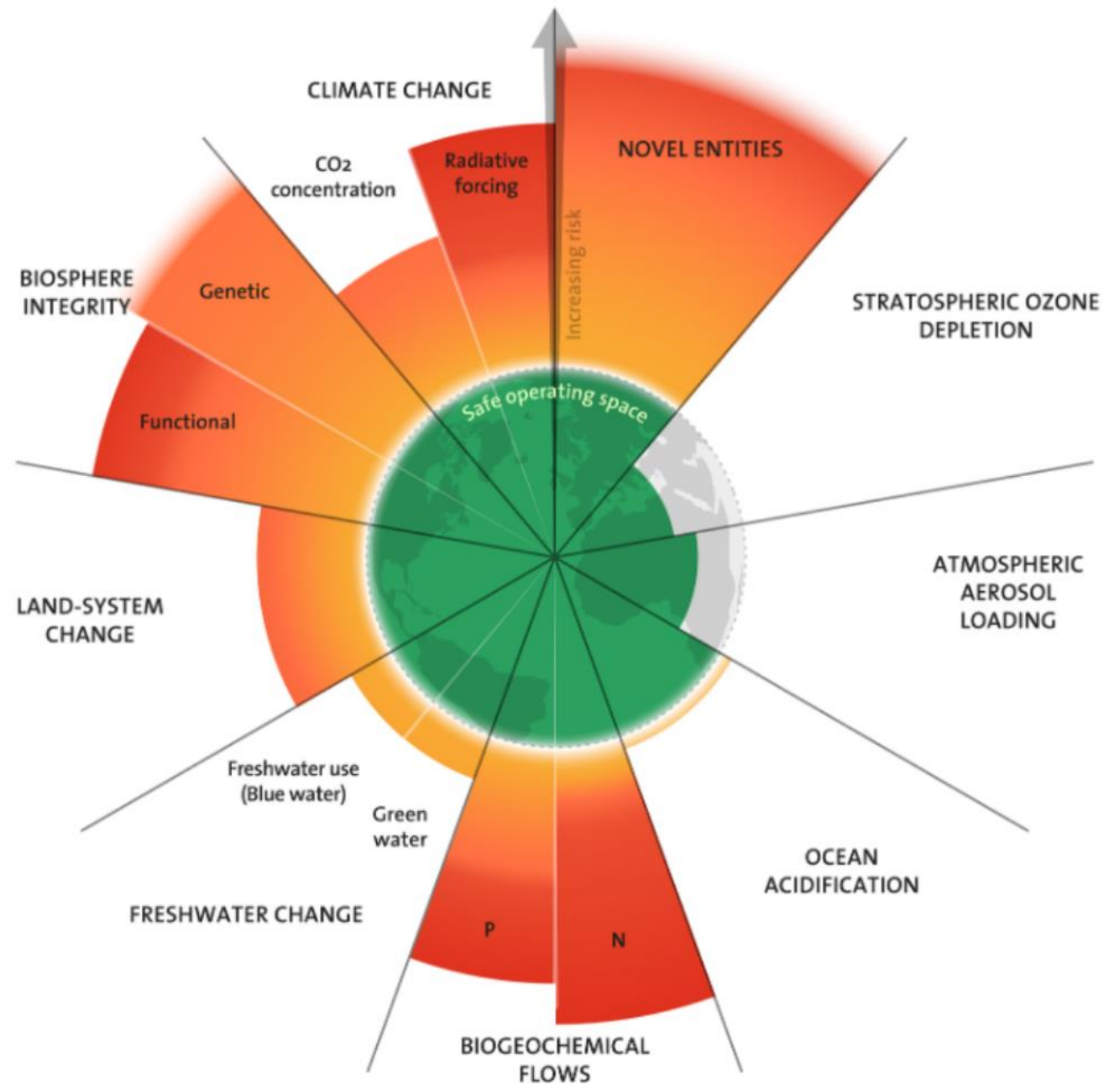
Sophie Walker

**CEO &
CO-FOUNDER**

*Digital Waste Tracking:
Using Rubbish Data
to Unlock the
Circular Economy*

*We are
trashing
our home
planet...*

*We must
act!*



The 2025 update to the Planetary boundaries. Licensed under CC BY-NC-ND 3.0. Credit: "Azote for Stockholm Resilience Centre, based on analysis in Sakschewski and Caesar et al. 2025".



“All advanced circular economy strategies, from refurbishment to recycling, depend on the availability of reliable and up-to-date data, which is currently largely unavailable.”

WBCSD

[Achieving a Circular Economy, WBCSD Report 2023](#)



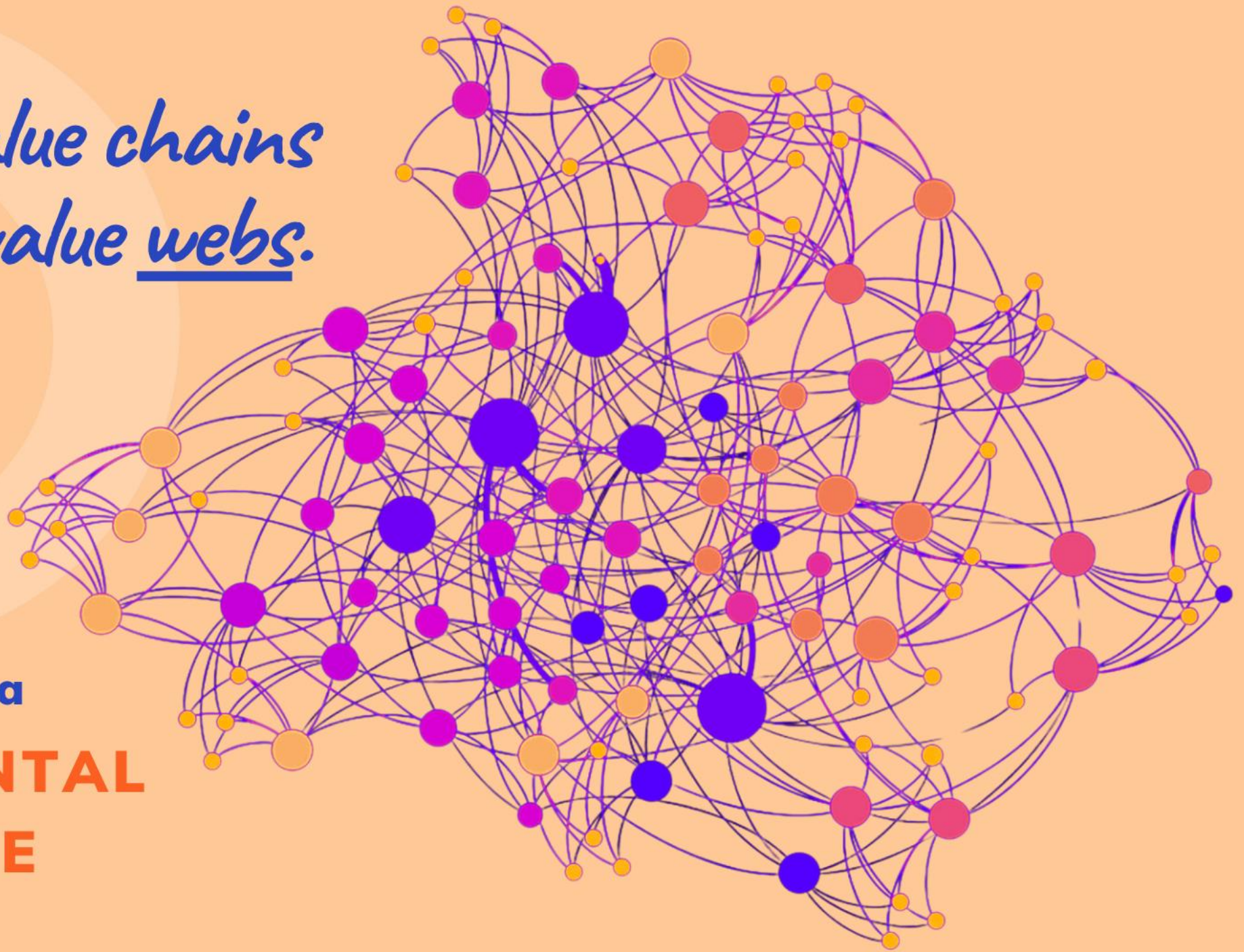
REPORTING HAS BECOME
AN INDUSTRY

*but it should be
a by-product!*

*Because value chains
are really value webs.*

Which leads to a

**FUNDAMENTAL
CHALLENGE**



BUT THE DATA IS...



Siloed



Single use



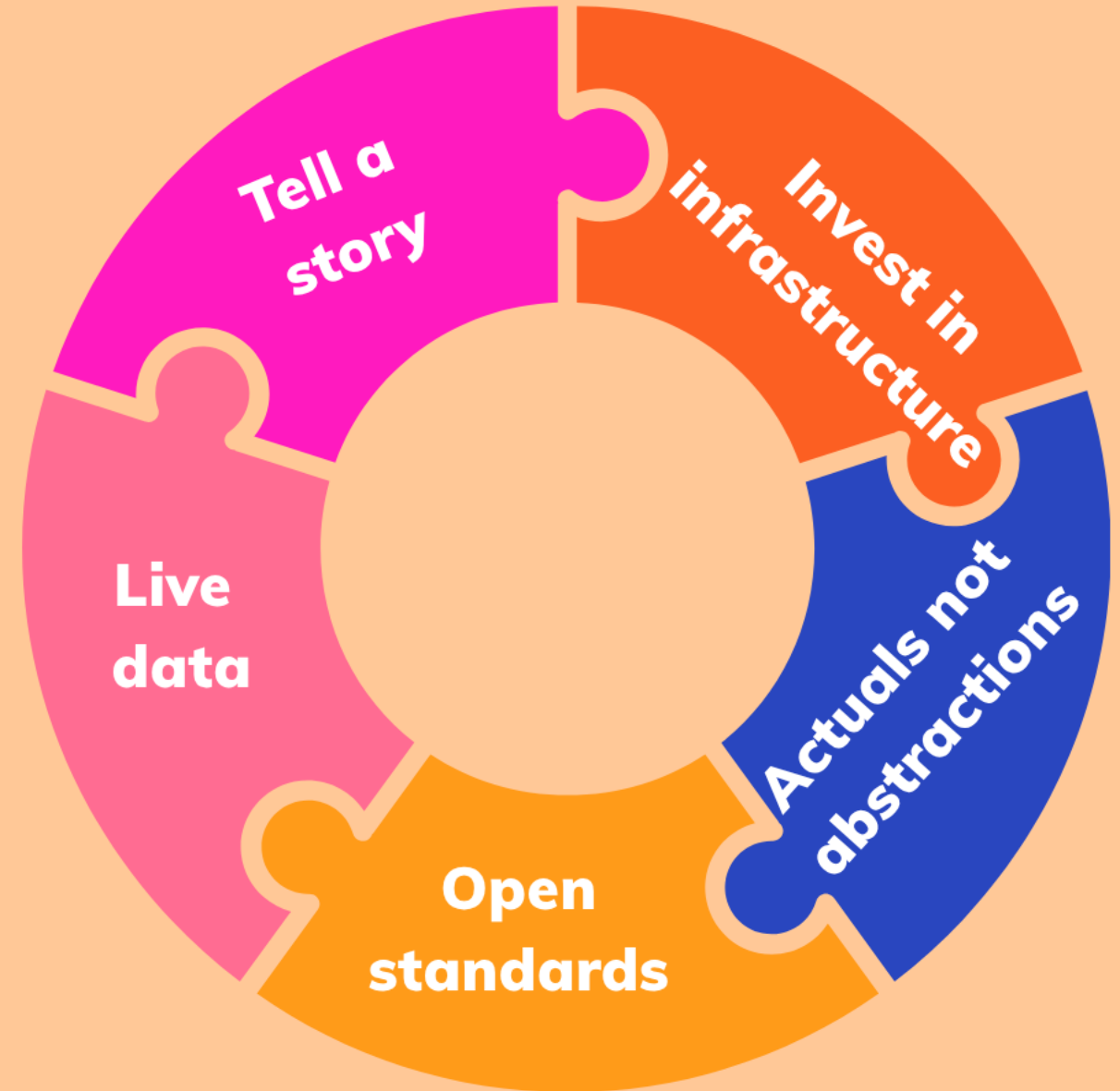
Time consuming

And...wrong!

5 core shifts to achieve

A CIRCULAR ECONOMY FOR

DATA



WHAT IS A DATA STANDARD?

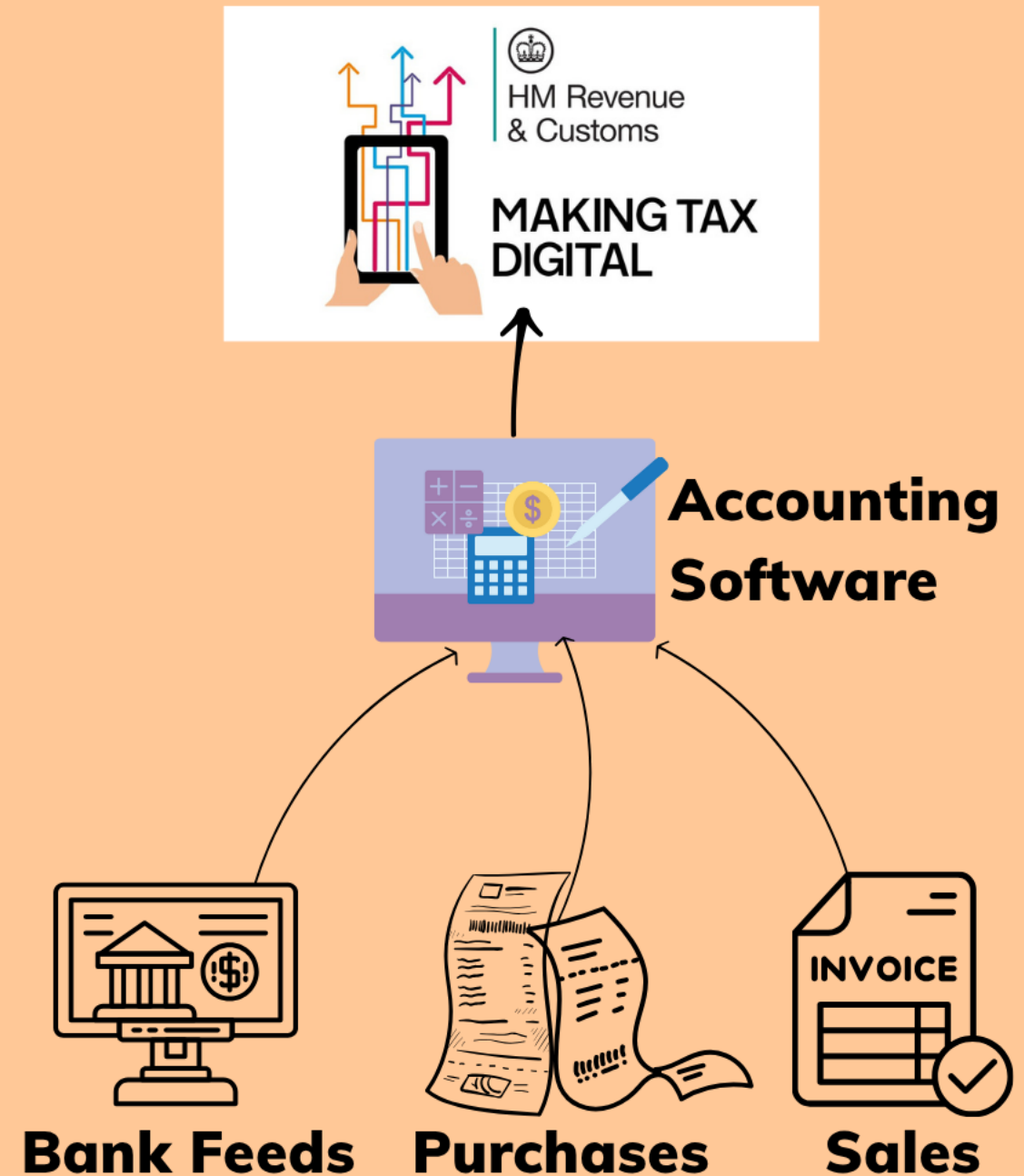
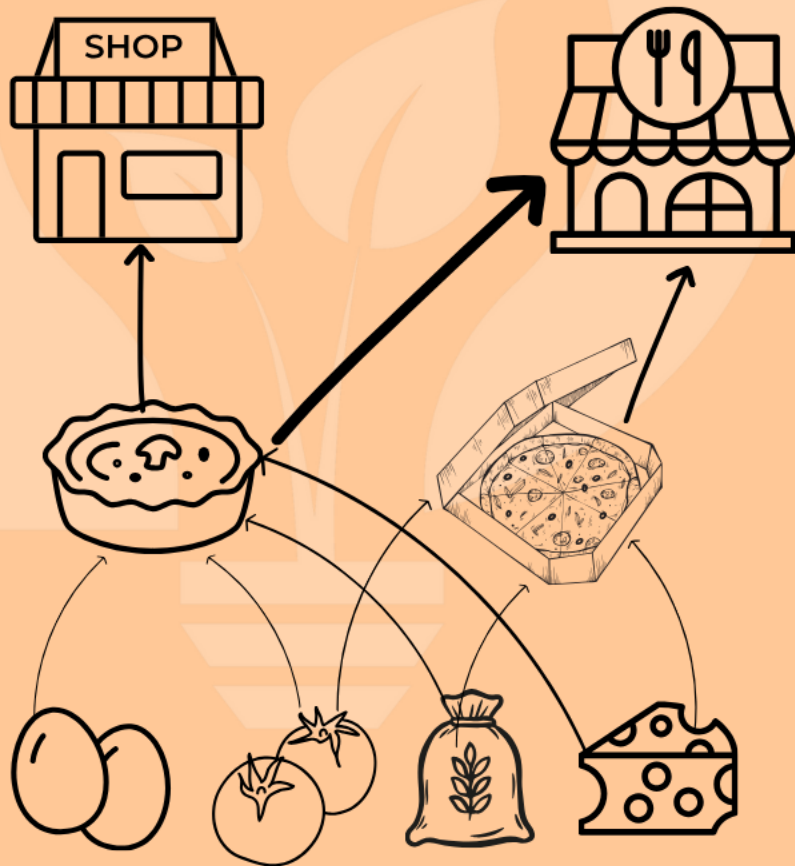
“A technical specification that describes how data should be stored or exchanged for the consistent collection and interoperability of that data across systems, sources and users.”

<https://resources.data.gov/standards/concepts/>

IT IS NOT: ✗DATA ✗TECHNOLOGY

Food Traceability

To a batch level, within 4 hours





*“Data is like garbage.
You’d better know what
you’re going to do with it
before you collect it.”*

MARK TWAIN

DERIVE MEANING **RATHER THAN ASSIGN IT**

Data in



Reflects reality

Assessment is



**Handled by
the system**

Outputs are

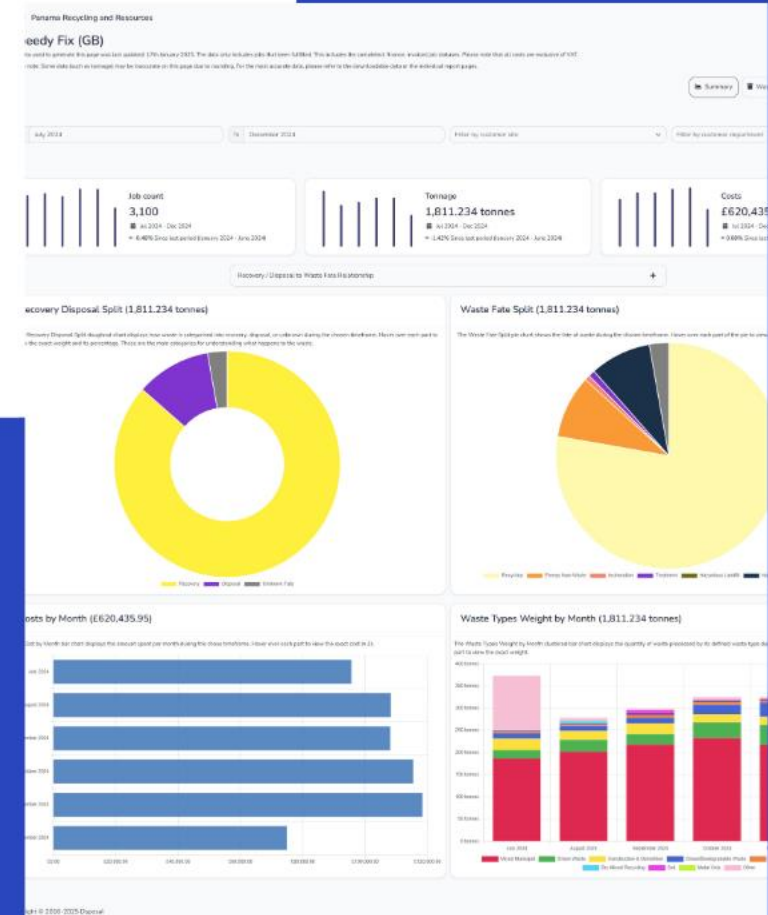
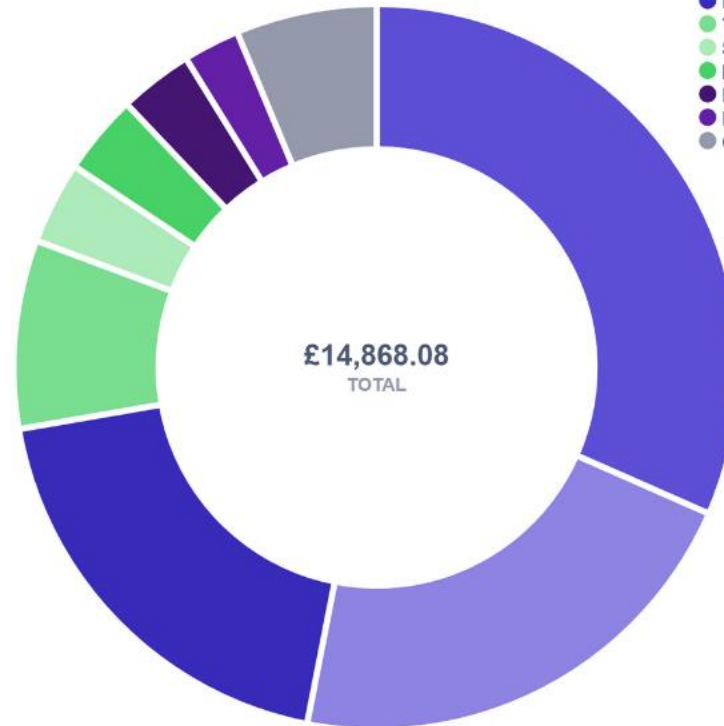


**Accurate,
dynamic, detailed**

Real data in

=

powerful insights out!



Download Refresh green waste						
COST	COST UNIT	TOTAL COST	PROFIT	GROSS MARGIN	PRIMARY	ACTION
£79.00 per tonne	weight / volume	£39.50 ✖	£18.68	32.11%	Primary	View
£154.44 per tonne	weight / volume	£154.44 ✖	£92.85	37.55%	Primary	View
£80.00 per tonne	weight / volume	£40.00 ✖	£24.155	37.65%	Primary	View
£68.75 per tonne	weight / volume	£34.875 ✖	£82.185	70.21%	Primary	View

We need a

DATA AMNESTY

“a fixed period of time during which people are not punished for committing a particular crime”



Thank you!
Sophie Walker
CEO & Co-Founder

Any Questions?



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South West Regional Committee Update



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South West

Thank you

For more information on CIWM and becoming a member,
please contact the team or visit our website

www.ciwm.co.uk