

Introduction of mandatory digital waste tracking

Overview

<i>General Comments</i>

Detailed Response

Specific Comments

6	<p>Would you be interested in joining our user panel? As part of the development of the digital waste tracking service we have formed a user panel of interested parties. Members of the panel are invited to participate in user research (for example surveys, workshops and interviews) or to test digital services as they are designed and built. Would you be interested in joining this panel?</p> <p>Yes/No/Already Signed up</p>
<p>Already signed up.</p>	
7	<p>Do you agree or disagree with the waste types we are proposing to be tracked?</p> <p>If you “Disagree” please tell us why</p>
<p>Disagree.</p> <p>The proposal is to require the digital waste tracking service to record information for ‘controlled waste’ (encompassing both hazardous and non-hazardous household, commercial and industrial wastes).</p> <p>Clarity is required on the scope and definition of ‘controlled waste’, particularly in relation to sewage, sludge and septic tank sludge being kept, treated or disposed of within the curtilage of a waste water treatment works (WwTW).</p> <p>Scottish Water’s understanding of the Controlled Waste Regulations 1992, which are applicable in Scotland, is that indigenous sludges arising from the waste water treatment process are not to be treated as commercial or industrial wastes for the purposes of Part II of the Environmental Protection Act (EPA) ie keeping, treating or disposing of indigenous sludges within the curtilage of a WwTW does not require a waste authorisation.</p> <p>As indigenous sludges are not considered to be a controlled waste for permitting</p>	

purposes, clarity is required on whether information relating to this type of waste needs to be recorded in the proposed digital tracking service.

8	<p>Do you agree or disagree with our proposals for which waste activities will be recorded in the waste tracking service?</p> <p>Agree/Disagree/No opinion If you “Disagree” please tell us why</p>
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Disagree.

Item 2 proposes that details of ‘*waste moved between sites managed by the same person*’ will be recorded in the waste tracking service. This is a significant change to current practice where a waste transfer note (WTN) is only required when waste is transferred from one person/company to another.

Clarity is required on the definition of ‘site’ in Item 2. Scottish Water’s asset base is significant¹ and wastes are moved between assets on a daily basis by our operators. For example, 35,975 sewer blockages were recorded in 2020/21 (Source: [ScottishWaterAnnualReport.pdf](#)). These can occur at any part of the sewer network and can generate waste (eg fats/grease/wipes). These locations would not normally be considered ‘sites’ and if there was a requirement to record every movement of material from sewer cleansing activities to waste water treatment works (WwTW), as well as other similar waste movements, this could have significant adverse administrative and cost impacts.

Item 3 proposes to record details of ‘*waste treated on site by the waste holder*’. Clarity is required on the definition of ‘treatment’, particularly in relation to whether information needs to be recorded for the treatment of indigenous sewage sludges (eg by dewatering, thickening, digestion etc.) (refer to response to Q7).

9	<p>Do you agree or disagree with our proposals for when waste tracking will not be required?</p> <p>If you “Disagree” please tell us why</p>
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Disagree.

The proposal appears to offer an exemption from recording information at the site of production for treatment, and subsequent disposal or recovery, of non-hazardous waste.

More information is required to understand how this would work in practice for sewage sludge. As mentioned in responses to Q7 & Q8, clarity is required on whether treatment of indigenous sewage sludge (ie thickening, dewatering, digestion etc.) needs to be recorded. Clarity is also required on whether production, and subsequent recovery, of biosolids would benefit from this exemption.

¹ 232 water treatment works, 48,886km of water mains, 1841 waste water treatment works (incl septic tanks), 54,163km of sewer pipes & rising mains, 2254 sewage pumping stations, 3641 combined sewer & emergency overflows (Source: WICS Annual Return 2019/20)

Furthermore, clarity is required on whether information related to other wastes arising from WwTW processes need to be recorded at the site of production prior to leaving the site for recovery or disposal (eg grit & screenings).

10	<p>Do you have any views about how we should incorporate waste activities conducted under Non-Waste Framework Directive exemptions, Low Risk Waste Positions and Regulatory Position Statements into the waste tracking service? Should we:</p> <ul style="list-style-type: none"> a) Require full details (as in the 'Waste activities to be recorded in the waste tracking service' section) b) Exempt them from the need to provide this further information, noting that this would present a gap in our overall waste picture c) Have a mixture of a) and b), with some specified activities coming with a requirement to record these details and others that do not d) Do something else to incorporate them <p>If you answered 'd) Do something else' please provide details</p>
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Do something else to incorporate them.

SEPA has a couple of Regulatory Position Statements that cover activities undertaken at Scottish Water assets. These are 'Wastes from Sewer Cleaning' (WST-PS-039) and 'Portable/Chemical Toilet Wastes' (WST-PS-046). Both require details to be reported in the data returns of the receiving WwTW.

As mentioned in response to previous questions, the practicalities of recording details of sewer cleaning wastes in the digital tracking service need to be better understood. The number of waste movements associated with this type of activity, together with the unplanned/reactive nature of most of the work and the fact that it is predominantly carried out 'in-house' (ie is not transferred to a third party), means that recording information in the system could be overly onerous for a low risk activity.

11	<p>Do you agree or disagree with our proposals to remove the requirement to submit information or waste data returns as listed, once the waste tracking service is live?</p> <p>If you "Disagree" please tell us why</p>
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Agree

12	<p>Do you agree/disagree/no opinion with the information recording proposals?</p> <ul style="list-style-type: none"> a) A system-generated unique identifier b) Details of the person who classified the waste c) Details about the destination for all waste movements, including the type of authorisation held d) Standard Industrial Classification (SIC) code e) Details of rejected or quarantined loads f) Details of waste treatment g) Persistent Organic Pollutants (POPs) identification
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	<p>h) Details of end of waste products and materials produced i) Information about onward destination of end of waste products or materials j) Nation specific requirements for any existing or future requirements</p> <p>If you “Disagree” with any of the proposals, please tell us why</p>
	<p>a) Disagree. As mentioned in the response to previous questions, the practicalities of requiring a Unique Identifier for all waste movements needs to be better understood, particularly in relation to activities that are high volume, reactive and do not involve transferring waste to another person/company eg sewer cleaning wastes.</p> <p>b) No opinion c) No opinion d) Disagree Clarification is required on the definition of “commercial premises”.</p> <p>e) No opinion f) Disagree As mentioned in response to previous questions, clarity is required on the definition of ‘treatment’, particularly in relation to indigenous sludges.</p> <p>g) Disagree It is not clear if the proposal to record whether a waste contains Persistent Organic Pollutants (POPs) will be mandatory and, if so, to what extent sampling will be required to enable this information to be entered into the system, particularly in relation to wastes that have non-hazardous EWC codes eg sewage sludge.</p> <p>h) No opinion i) Agree j) No opinion</p>
<p>13</p>	<p>Persistent Organic Pollutants – how much information about POPs do you think should be recorded in the service?</p> <p>a) Basic level - Indication that waste contains POPs only b) Enhanced level – Additional details on the specific POPs contained in the waste and the content level of the POPs c) Other d) No opinion</p> <p>If you answered 'Other', please provide details</p>
	<p>Other</p> <p>It is not clear if the proposal to record information on the POPs content applies to all wastes, regardless of whether a waste is categorised by a non-hazardous EWC code.</p> <p>If it is mandatory for all wastes, then this will require additional sampling activities and it will not be practical to do this for all waste movements, particularly where waste is moved in high volumes on a frequent basis.</p>



14	<p>Is there any other information related to waste management that you think should be recorded in a new digital waste tracking service?</p> <p>Yes/No/No opinion</p> <p>If you answered 'Yes', please provide details</p>
No opinion	
15	<p>Are you familiar with the existing D & R codes?</p> <p>Yes/No/Not applicable to you</p>
Not applicable	
16	<p>Do you find D & R codes easy to apply?</p> <p>Yes/No/Not applicable</p> <p>If you answered 'No', please tell us why you find them hard to apply</p>
Not applicable	
17	<p>Do you have any suggestions as to how recovery or disposal activities should be recorded in the waste tracking service?</p> <p>Yes/No</p> <p>If you answered 'Yes', please provide details</p>
No	
18	<p>End of waste products or materials – do you use any existing standard codes or descriptions to record end of waste products produced from waste?</p> <p>Yes/No</p> <p>If you answered 'Yes', please provide details</p>
No	
19	<p>Do you transport hazardous waste?</p> <p>Yes/No</p>



Yes	
20	How do you currently record dangerous goods information? On a paper record/ On a digital record/Both/Not applicable
Not applicable	
21	Where do you think information demonstrating compliance with the Dangerous Good Regulations with regards to the movement of waste should be recorded? In the new waste tracking service/Somewhere else/No opinion If you answered, 'Somewhere else', please provide details
No opinion	
22	If you produce, manage or handle waste in any way, were you aware of your duty to apply the waste hierarchy prior to reading this consultation? Yes/No/Not applicable
Yes	
23	Do you think waste holders including producers should record their compliance with the application of the waste hierarchy in the Waste Tracking service? If you answered 'Yes' please provide details of how you think this should be done. If you answered 'No' please provide details of how else you think it should be demonstrated.
No	
Clarity is required on the scope of information that would need to be recorded in the Waste Tracking Service to demonstrate compliance.	
24	If you are likely to need to enter data into the waste tracking service, which of the options would you use for the majority of your data entries? a) Manual entry b) Data upload from existing spreadsheet records onto a waste tracking service standard spreadsheet c) Data upload from existing waste tracking software onto a waste tracking service standard spreadsheet d) Direct data upload via an application programming interface (API) e) Something else f) No opinion

If you answered, 'Something else', please provide details	
<p>e - Something else</p> <p>At this point in time, without having visibility of the Waste Tracking System or details of when it will become operational, it is not possible to confirm which option would be used for the majority of our data entries. We are in the process of developing a business-wide Waste Management System and so, one or more of these options could be used in combination.</p>	
25	<p>When recording data in your current systems, do you use any form of data standard?</p> <p>If you answered 'Yes', please tell us what these data standards are.</p>
No	
26	<p>Do you agree or disagree with our ambition for real time recording of waste movements and transfers?</p> <p>If you answered 'Disagree', please tell us why</p>
<p>Disagree</p> <p>Scottish Water understands the benefits that real time recording would bring to regulators. Further information is required on how this would be implemented to fully understand the implications from an operational perspective. For real time recording to be effective, it needs to be practical. Aspects that need to be considered and addressed include:</p> <ul style="list-style-type: none"> • data quality – sufficient time is required to ensure that the necessary quality checks can be carried out • data quantity – as mentioned in response to Q8, Scottish Water has a significant asset base and wastes are generated and moved on a daily basis. Recording details of every waste movement in real time would require additional, potentially significant, resources. • Data availability – Scottish Water relies on receipt of third-party data for some waste movements, and this may not be available immediately. For example, farmers receiving our biosolids, who may not have access, or the ability, to use the digital tracking system, might not immediately provide us with the necessary data to enter on their behalf. • connectivity – access to the digital tracking system may impossible/unreliable in rural areas. 	
27	<p>For the following types of waste movements or transfers, how long do you think you would need to transition to real time recording?</p> <p>Hazardous waste Non-hazardous waste Green List Waste imports or exports</p> <p>Less than 1 year/1 to 3 years/More than 3 years/Not applicable</p>

	<p>Hazardous waste – more than 3 years</p> <p>Non-hazardous waste – more than 3 years</p> <p>Green List waste imports/exports – Not applicable</p>
28	<p>What are the main barriers or motivators that will influence the time it takes you to transition to real time reporting?</p> <p>Please describe in the box below</p>
	<p>The time it takes to transition to real time reporting will be dependent on a number of factors including:</p> <ul style="list-style-type: none"> • The method used for data entry. It is anticipated that direct entry or automatic transfer to the system would be quicker than uploading spreadsheets and it will take time to change existing processes, or develop new ones, to move towards real time reporting. • Resources. The requirement to record data for all waste movements, instead of only those that are transferred to another person/company, significantly increases the amount of data that will need to be entered into the system. This will require additional resources (people, IT equipment etc). The time taken to acquire these new resources will be dependent on when more information becomes available to adequately assess the need (eg how much data is to be recorded, how and when). • Training & Development Time will be required to ensure any existing systems, or any currently being developed, are compatible with the new Digital Tracking Service. Training in the use of the new system will also be required. • Access to the system. In some rural/remote areas, access to the digital system may be impossible/unreliable.
29	<p>Do you agree/disagree/no opinion with the overall proposed processes as set out in: -</p> <p>Annex A - Hazardous and non-hazardous waste movements Annex B - Green List Waste exports Annex C - Green List waste imports</p> <p>If you answered 'Disagree' for any of the processes, please tell us why</p>
	<p>Annex A – No opinion Annex B – No opinion Annex C – No opinion</p>
30	<p>How far in advance of a waste movement should the information listed under Step 1 in each of the processes be entered onto the waste tracking service?</p> <p>Any time before the waste movement/At least 1 day before/At least 3</p>

	<p>days before/other</p> <p>If you answered 'Other' for any of the options above, please provide further details</p>
	<p>Annex A – Other</p> <p>Not all waste movements are planned. For example, the majority of sewer network cleaning activities are reactive (unplanned). It would not be practical to remove waste from the network and store it at that location before the movement is recorded in the tracking service.</p> <p>Some work might also be planned and then not take place eg there might be a plan to empty a private septic tank on a specific date, but this could then be delayed for a variety of reasons. If the information listed in Step 1 is entered before it is known the tank emptying will be postponed, then more information is required on the steps that need to be taken to cancel the Unique Identifier that would have been generated.</p> <p>The digital tracking system needs to incorporate sufficient flexibility to allow reactive work and changes to planned work.</p> <p>Annex B – Other</p> <p>No opinion</p> <p>Annex C – Other</p> <p>No opinion</p>
<p>31</p>	<p>Who should be responsible for entering the information listed under Step 1 in Annex A in advance of the movement of hazardous or non-hazardous waste?</p> <p>Waste producer/Waste carrier/Waste broker or dealer/Any of the above/Other</p> <p>If you answered 'Other', please provide details</p>
	<p>Any of the above.</p> <p>Where the waste producer is a member of the public (household waste), it would be more appropriate for the waste professionals to enter the information.</p>
<p>32</p>	<p>Within what time frame should waste carriers enter the information as required in Step 2 Annex A and Step 4 for Annex B?</p> <p>24hours/48hours/3 working days/1 week/other</p> <p>Annex A - Hazardous and non-hazardous waste movements</p> <p>Annex B - Green List waste exports</p>

	<p>If you answered 'Other' for either of the rows above, please provide further details</p>
	<p>Annex A – Other For consistency and fairness, timescales should align with those for digitally excluded people.</p> <p>Annex B – Other No opinion</p>
<p>33</p>	<p>Do you think there should be any difference in the requirements depending on whether hazardous or non-hazardous waste is being handled?</p> <p>Yes/No/No opinion</p> <p>If you answered 'Yes', please provide details</p>
	<p>No opinion</p>
<p>34</p>	<p>Waste receiving sites - Within what time frame should waste receiving sites be required to provide the information about</p> <p>a) the waste received at their sites, b) the disposal, recovery, preparation for re-use or treatment of waste, including information about any end of waste products or materials produced from it?</p> <p>24hours/48hours/working days/week/other/no opinion</p> <p>If you answered 'Other' for either of the rows above, please provide further details</p>
	<p>a) Other b) Other For consistency and fairness, timescales should align with those for digitally excluded people.</p>
<p>35</p>	<p>Season tickets – Do you have any comments to make about this proposal or how you would like to see these movements incorporated in the waste tracking service?</p> <p>Yes/No</p> <p>If you answered 'Yes', please provide details</p>
	<p>Yes</p> <p>Scottish Water's preference would be to have signed agreements that were updated on an annual basis, with the option of recording dates and volumes of individual waste movements/transfers.</p>



36	<p>Do you agree/disagree/no opinion with the proposed requirements for each of the roles in Table 3?</p> <p>Requirements: -</p> <ul style="list-style-type: none"> a) common to all? b) common to waste producers, carrier, brokers and dealers? c) applicable to waste producers only? d) applicable to waste carriers only? e) applicable to waste carriers or brokers only? f) applicable to operators of waste receiving sites only? <p>If you answered 'Disagree' to any of the above statements, please tell us why</p>
	<ul style="list-style-type: none"> a) No opinion b) No opinion c) Disagree Clarity is required on a householder's responsibilities, as a waste producer, prior to waste being removed from their property. It is common for septic tanks to be emptied from homes/holiday houses without the owner being present. d) No opinion e) No opinion f) No opinion
37	<p>How should waste producers be required to 'confirm' the information recorded for their waste movements?</p> <p>Option 1- within the tracking service Option 2 - through an emailed summary Option 3 - by exception Another way No opinion</p> <p>If you answered, 'Another way', please provide details</p>
	<p>Option 3 – by exception</p> <p>Scottish Water generates a significant amount of waste that is subsequently removed from sites by various waste carriers. To minimise impact on resources, our preference would be to receive a periodic summary of waste movements, instead of providing confirmation for each waste movement by pressing a button or providing an electronic signature.</p> <p>Access, at any time, to a dashboard would also be beneficial. This would provide another way to review movement of our wastes.</p>
38	<p>Do you agree or disagree with the general principles as set out regarding digitally excluded individuals subject to waste tracking requirements?</p> <p>Agree/ Disagree/ No opinion</p>

	If you answered 'Disagree', please tell us why
	<p>Disagree</p> <p>There is an underlying assumption that the status of digitally excluded users is unlikely to change. For those who might be digitally excluded on an intermittent basis (eg operatives undertaking unplanned work at a rural/remote location), the general principles do not clearly set out how will this affect the registration process or what evidence would be required to demonstrate their exclusion position.</p>
39	<p>Do you agree or disagree with the proposed alternative methods for digitally excluded individuals to provide the required information?</p> <p>Agree/Disagree/No opinion</p> <p>If you answered 'Disagree', please tell us why</p>
	<p>Disagree</p> <p>As set out in the response to Q38, there may be occasions when access to the digital tracking system is not possible in rural/remote locations. It is not clear if the alternative methods, specifically the telephone service, will be available in those circumstances.</p>
40	<p>How long should digitally excluded users be given to provide the information required via the postal service element of these provisions?</p> <p>For example, updated waste movement information or details of waste treatment or production of materials from waste.</p> <p>7 days/14 days/1 month/Other/No opinion</p> <p>If you answered 'Other', please provide details</p>
	<p>Other</p> <p>For consistency and fairness, timescales should be aligned with those for non-excluded users.</p>
41	<p>Do you agree/ disagree/no opinion with the proposed level of access to information for each of the different types of users as set out in Table 4?</p> <ul style="list-style-type: none"> a) Relevant Government officers and environmental regulators? b) Tax authorities c) Waste scheme administrators d) Local authorities e) Businesses involved in waste movements f) Producers and carriers g) Waste receiving sites h) Household waste producers i) Wider public and interested parties <p>If you answered 'Disagree' to any of the above statements, please tell us</p>

why	
<p>a) to h) – Disagree</p> <p>It is not clear from the consultation document whether this user would have access to the '<i>names of waste company staff, for example site managers and drivers</i>'. It is not clear why this type of information needs to be held in the digital tracking system.</p> <p>i) Disagree</p> <p>It is not clear from the consultation document whether this user would have access to the '<i>names of waste company staff, for example site managers and drivers</i>'. It is not clear why this type of information needs to be held in the digital tracking system.</p> <p>In addition, clarity is required on the details of the information that would be made available for the '<i>end fate of waste</i>'. In particular, Scottish Water would be very concerned if information was provided that would enable the identification of farms and fields that had received biosolids. Publicising details of recipients of sewage sludge will distort competition, as the use of other organic and inorganic fertilisers and manure does not require the same level of transparency; farmers would be more likely to choose fertilisers which allow them to keep their fertiliser-use data confidential. Only publicising data on biosolids use does not offer tangible value and instead risks lowering the willingness to apply this material to agricultural land, which is contrary to circular economy goals such as increasing the recycling of nutrients.</p>	
42	<p>Do you agree or disagree that waste producers should be able to see information about the end fate of their waste?</p> <p>Agree/Disagree/No opinion</p> <p>If you answered 'Agree', please provide details of what you think this should include.</p> <p>If you answered 'Disagree', please tell us why</p>
<p>Agree</p> <p>As a waste producer, Scottish Water wants to have full visibility of our waste movements.</p>	
43	<p>Do you agree or disagree with our proposals on UK GDPR?</p> <p>Agree/Disagree/No opinion</p> <p>If you answered 'Disagree', please tell us why</p>
<p>No opinion</p>	
44	<p>Do you agree or disagree with our proposals on managing sensitive information?</p> <p>Agree/Disagree/No opinion</p>

	<p>If you answered 'Disagree', please tell us why</p>
	<p>Disagree It is not clear if the proposals on managing sensitive information apply only to locations that, if disclosed, could be contrary to the interests of national security. As mentioned in the response to Q41, Scottish Water would consider waste movements related to biosolids applications to agricultural land to be sensitive information.</p> <p>If this activity was deemed to meet the criteria for sensitive information, the practicalities of contacting the regulator for unique identifiers for each movement of biosolids would need to be assessed. We would be willing to take part in testing options for development of this part of the service.</p>
<p>45</p>	<p>Do you have any comments about our proposals (or your needs) for data retention?</p> <p>Yes/ No</p> <p>If you answered 'Yes', please provide details</p>
	<p>Yes It is not clear which records will be retained for the current required duration, or how long that timeframe is. It is not clear if the standard retention time will be a minimum of 20yrs, or until a permit is surrendered. It is also not clear why a period of six years needs to pass before personal data and electronic signatures will be anonymised.</p>
<p>46</p>	<p>Do you agree or disagree with the proposed offences and associated enforcement options as set out in Table 5?</p> <p>Agree/Disagree/No opinion</p> <p>If you answered 'Disagree', please tell us why</p>
	<p>Disagree Clarity is required on what action would be taken if waste had to be moved/received without a Unique Identifier. For example, if Unique Identifiers could not be generated due to a breakdown/outage of the digital system, would it remain a criminal offence to move waste. The practicalities of such a situation need to be considered.</p>
<p>47</p>	<p>Do you think there should be a maximum limit for variable monetary penalties set out in legislation?</p> <p>Yes/No/No opinion</p> <p>If you answered 'Yes', please provide details of what you think this limit should be</p>
	<p>Yes The maximum limit for a Variable Monetary Penalty should align with the maximum fine applicable under the Special Waste Regulations 1996.</p>

48	<p>Do you agree or disagree with our proposed functions for environmental regulators?</p> <p>Agree/Disagree/No opinion</p> <p>If you answered 'Disagree', please tell us why</p>
<p>No opinion</p>	
49	<p>Do you think costs relating to the investigation of and enforcement action taken against those not complying with the requirements of waste tracking should be recoverable through the fees and charges for users of the waste tracking service?</p> <p>Yes/No/No opinion</p> <p>Please provide more information to support your answer if you wish</p>
<p>No opinion</p> <p>Scottish Water would note that if costs associated with enforcement action are recovered through the fees for users of the tracking system, then the mechanism for calculating subsistence charges for waste authorisations should be reviewed to ensure there is no double counting.</p>	
50	<p>What is your preferred option for who should pay the IT service operation and maintenance costs?</p> <p>Option A - the persons or business who enters the preliminary waste tracking information?</p> <p>Option B - a specific user group?</p> <p>Option C - existing waste related fee payers?</p> <p>Other?</p> <p>No opinion?</p> <p>If you selected 'Option B -a specific user group', please tell us what user group(s) this should be</p> <p>If you answered 'Other', please provide further details</p>
<p>Other</p> <p>Clarity is required on the magnitude of the operational and maintenance costs before Scottish Water can comment on a preferred option.</p>	
51	<p>What is your preferred option for what type of cost it should be?</p> <p>1 - a per record fee?</p> <p>2 - a flat annual fee?</p> <p>3 - an increase to existing fees?</p> <p>Other?</p> <p>No opinion?</p>

	<p>If you answered 'Other', please provide further details</p>
	<p>Other As mentioned in response to previous questions, it is currently not clear if all waste movements carried out by Scottish Water will need to be recorded in the tracking system. Given the significant number of waste movements currently undertaken, if these were all to be recorded and a fee applied 'per record', this could have a significant financial burden. Further information is required before Scottish Water can comment on a preferred option.</p>
<p>52</p>	<p>What is your preferred option for how the costs should be collected?</p> <p>X - on-submission payment facility? Y - credit system? Z - environmental regulators recover service costs through existing fees and charges? Other? No opinion?</p> <p>If you answered 'Other', please provide further details</p>
	<p>Other Any cost collection proposal needs to be practical for those undertaking large number of waste movements on a regular basis. If costs are to be recovered by regulators, then the charging mechanism needs to be fully transparent to enable the costs associated with the waste tracking service to be easily distinguishable from other fees.</p>
<p>53</p>	<p>Which approach to getting all users onto the waste tracking service do you think we should adopt?</p> <p>Option 1 - everyone must use the service from the day it goes live Option 2 - voluntary use for a specified length of time, then mandatory for all? Option 3 - mandating some waste holders use the service or certain types of waste movement must be recorded on the service first, then on-boarding others over time? Something else? No opinion?</p> <p>If you answered, 'Option 3', which users or waste types do you think should come first and why?</p> <p>If you answered, 'Something else', please provide details</p>
	<p>Option 2</p>
<p>54</p>	<p>Considering your answer to question 24 in the 'Ways to enter information' section, how much do you think it will cost your organisation to transition to this way of working?</p> <p>Staff training (cost for the total number of hours across all necessary staff)</p>

	<p>Familiarisation time (cost for the initial time spent getting to understand the system-cost of the total number of hours across all necessary staff)</p> <p>Requirements' familiarisation (time to understand new legal requirements - cost of the total number of hours across all necessary staff)</p> <p>Customer engagement (for example, communications to customers around any new processes you'll be adopting to comply with the new system, or what they need to do to comply)</p> <p>Changes to current IT systems (this could include, for example, the cost of the total hours spent updating your current spreadsheet to align with a standardised template, or decommissioning any current IT you have)</p> <p>Provision of any on-site technology (such as the cost of tablets or smartphones for waste collection operatives to record waste transactions on-site in real-time)</p> <p>Other (please describe these)</p> <p>Please provide a figure for each of the costs outlined above and details of any others you foresee incurring as part of the transition to digital waste tracking. Please provide costs in pounds for the first year only and only include new additional costs associated specifically with the waste tracking service, not costs for staff or infrastructure that would be incurred in the absence of the new waste tracking service.</p>
<p>Scottish Water has no cost information readily available to share in response to this consultation.</p>	
55	<p>Do you think your organisation would make any savings by transitioning to this way of working? Such as from:</p> <ul style="list-style-type: none"> Reduction in data storage costs Reduction in time spent checking data quality Savings in not having to complete/submit waste returns to regulators Reduction in time spent obtaining/providing waste information from or to customers Other? <p>Please provide a figure for each of the potential savings outlined above and details of any others you foresee as part of the transition to digital waste tracking. Provide savings in pounds for the first year only.</p>
<p>Scottish Water does not have data on the costs associated with each of the above categories of current working and so cannot provide details of potential savings.</p>	
56	<p>Alongside this consultation we have published an impact assessment setting out the costs and benefits we foresee from the introduction of a mandatory digital waste tracking service, based on assumptions made from the evidence currently available. Have we made any assumptions that you disagree with?</p>

	<p>Yes/No/No opinion</p> <p>If you answered 'Yes', please tell us why you disagree and if possible, provide details of better information we could use to inform our assumptions</p>
<p>Yes</p>	<p>The Impact Assessment concludes that Option 3 (provide a central waste tracking service for all waste and mandate its use) offers <i>'the best value for money for the taxpayer while achieving the policy aims and intended effects'</i>. Options 1 and 2 are not preferred because <i>'the current detrimental impacts incurred by the natural environment, local communities and legitimate business would not be sufficiently addressed'</i>.</p> <p>Scottish Water notes that the transition costs for waste producers and waste carriers, brokers and dealers have not been monetised at this stage. Until a full impact assessment is completed that includes these costs, then an accurate comparison of the options cannot be deemed to be concluded.</p>
<p>57</p>	<p>Overall, how satisfied are you with our online consultation tool?</p> <p>Very satisfied/Satisfied/Neither satisfied nor dissatisfied/Dis-satisfied/Very dissatisfied/Don't know</p> <p>Please give us any comments you have on the tool, including suggestions on how we could improve it.</p>
<p>Neither satisfied nor dissatisfied</p>	

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