Getting Ready for Digital Waste Tracking in Scotland

SEPA Consultation

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland.
For information only: England, Northern Ireland and Wales.

1 Executive Summary

The Scottish Environment Protection Agency (SEPA) is seeking feedback from operators of permitted waste facilities in Scotland ahead of the introduction of the mandatory Digital Waste Tracking (DWT) requirements. The consultation aims to understand how prepared operators are for the new system, identify potential implementation challenges and establish what guidance and support may be required.

Digital Waste Tracking is a UK-wide initiative designed to improve the recording and monitoring of waste movements, replacing fragmented paper-based systems with a centralised digital service. The first phase of the new requirements will come into force in Scotland on Friday 1 January 2027, initially applying to permitted facilities receiving waste.

Although the initial requirements do not apply to all local authority waste operations, councils should consider whether any facilities they operate fall within scope. Responses are due by **Monday 7 December 2026**.

Click here for further information and to submit your response.

2 Overview

Digital Waste Tracking aims to modernise how waste movements are recorded, providing greater visibility of waste from its origin through to its final destination. By replacing multiple existing paper-based systems with a shared digital platform, the initiative is intended to improve regulatory oversight, reduce waste crime and support more effective waste management.
The system is being introduced across the UK, with implementation in Scotland taking place in two phases. The first phase, commencing on Friday 1 January 2027, will apply to operators of permitted facilities receiving controlled waste, including waste transfer stations, composting sites, landfills, scrap yards and end of life vehicle sites, and energy from waste facilities. Operators will be required to submit information about waste received through the digital service.

SEPA has identified an exemption for local authority permits relating to Household Waste Recycling Centres and transfer stations where waste is bulked up and stored before being transferred elsewhere for disposal, recycling or treatment. The second phase, expected in October 2027, will extend requirements to other parts of the waste management chain.

2.1 Implications for local authorities

Local authorities should consider whether any of their permitted waste management facilities fall within the initial requirements, taking account of the exemptions outlined by SEPA. Where applicable, councils may need to review existing waste recording arrangements, digital systems and staff preparedness ahead of implementation.

There are also wider implications for local authority waste services as digital tracking requirements extend across the waste management sector. Councils will need to understand how the new arrangements interact with existing contractual relationships and responsibilities for recording and monitoring waste movements, particularly where collection, transportation and treatment services are delivered by external contractors.

3 Consultation Questions

The consultation questions are categorised as follows:

Topic	Questions
About you	3
Awareness and readiness	4
Challenges	2
Future communications	1
Industry body	1
Any further concerns	1

The consultation questions are available in full below:

1. What best describes your organisation?

    1. a) Permitted facility receiving controlled waste (select all that apply):
    Waste transfer station;
    Composting site;
    Scrap yard/end of life vehicle site;
    Landfill;
    Energy from waste facility;
    Other (please specify)

    1. b) Operated by:
    Limited company;
    Sole trader;

Local authority;
Other (please specify)

2. How many people does your organisation employ?
   1-9; 10-49; 50-249; 250 or more employees; Don't know

3. In which area of Scotland is your permitted facility, receiving controlled waste, based in?

4. How familiar are you with Digital Waste Tracking?
   I know a lot about it;
   I know a little about it;
   I have heard of it but do not know much about it;
   I had not heard of it

5. Has your organisation started preparing for the introduction of Digital Waste Tracking on the 1 January 2027?
   Yes, we are ready;
   Yes, we have started preparing;
   No, we have not started yet;
   Don't know

6. Have you registered to voluntarily use Digital Waste Tracking before it is introduced on 1 January 2027?
   I have registered but not started uploading data;
   I have registered and am uploading data using software;
   I have registered and am uploading data using the Digital Waste Tracking spreadsheet;
   I have not registered or started uploading data

7. How will you submit your data to Digital Waste Tracking?
   Using existing software we already have;
   Using new software;
   Using Digital Waste Tracking spreadsheet;
   Don't know

8. What are the biggest challenges for your organisation in preparing for Digital Waste Tracking? (Select up to 3)
   Cost;
   Lack of time;
   Lack of clear guidance;
   Lack of knowledge or understanding;
   Software or IT limitations;
   Colleague training needs;
   Uncertainty about what is required;
   Competing business priorities;
   No significant challenges;
   Other (please specify)

9. Please tell us more about the challenges your organisation is facing in preparing for Digital Waste Tracking.

10. How would you like to receive information, advice, and guidance from SEPA? Select a first and second preference.
    SEPA business update newsletter;
    Letter;
    Social media;
    LinkedIn;
    Trade newsletter;
    Industry bodies;
    Other (please specify)

11. Please specify which industry body you would like future communications from?
    Resource Management Association;
    Scottish Environmental Services Association;
    Chartered Institute of Waste Management;
    Convention of Scottish Local Authorities;
    Renewable Energy Association;
    Local Authority Waste Managers;
    Other (please specify)

12. Do you have any other concerns you would like to tell us about complying with your new Digital Waste Tracking obligations?

4 APSE Comment

APSE recognises the importance of improving the recording and monitoring of waste movements and welcomes the efforts to modernise existing arrangements through Digital Waste Tracking. The introduction of a more consistent approach across the waste management sector has the potential to improve transparency and support the effective regulation of waste activities.

For local authorities, it will be important that the introduction of the new requirements is accompanied by clear guidance on which facilities and operations fall within scope, particularly given the exemptions identified for certain facilities. Councils should have access to sufficient information to understand whether any changes to their existing arrangements will be necessary and what steps, if any, they may need to take ahead of implementation.

APSE would also highlight the value of continued engagement with local authorities as Digital Waste Tracking is rolled out. Sharing information about the implementation process, providing practical guidance and allowing operators to raise concerns will help ensure that potential challenges are identified at an early stage.

APSE encourages relevant local authorities and waste operators to engage with SEPA, helping to

inform the support and guidance required ahead of implementation.

5 How can APSE help?

Discussions on the way forward with Digital Waste Tracking and the sharing of best practice continue to take place in APSE Scotland's Waste and Recycling Network. All of our network meetings are free to attend for APSE members, with previous presentations available online here and upcoming meetings listed here. APSE's Street Cleanings Seminar on 4 February 2027 in Birmingham will also cover this topic, for more information on the Seminar please click here

All APSE members can access the APSE Scotland network, which provides updates, information, and opportunities to engage with colleagues across local government in Scotland. Members can keep up to date with regional activities, events, policy developments, and networking opportunities by visiting the Scotland members' area. You can access the network using this link: APSE Scotland

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APSE member authorities have access to a range of membership resources to assist in delivering council services. This includes our regular network meetings, specifically designed to bring together elected members, directors, managers and heads of service, together with trade union representatives to discuss service specific issues, innovation and new ways of delivering continuous improvement. The networks are an excellent forum for sharing ideas and discussing topical service issues with colleagues from other councils throughout the UK.

Networks are a free service included as part of your authority's membership of APSE and all in-person meetings end with an informal lunch to facilitate networking with peers in other councils. If you do not currently receive details about APSE Network meetings and would like to be added to our list of contacts for your service area, please email enquiries@apse.org.uk

Our national networks include:-

- FM and Building Cleaning
- Catering (School Meals)
- Cemeteries and Crematoria
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Social Value, Procurement and Commercialisation Network
- Parks, Horticulture and Grounds Maintenance
- Renewables and Climate Change
- Roads, Highways and Street Lighting
- Sports and Leisure Management
- Vehicle Maintenance and Transport
- Veterans and Military Champions Network
- Local Government Reorganisation Network
- Waste Management, Recycling and Street Cleansing

Visit www.apse.org.uk for more details.

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