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What sector are you writing from?:

Local/Regional Government Agency/Public Body

4 What are your views, if any, on the proposal to repeal the Site Waste Management Plans regulations?

Please type your response here:

We have consulted our Members which are made up of Universities and Colleges across the UK. Below is the combined response from our Members.

Construction waste accounts for a significant tonnage, compared to other waste streams within institutions. Often one project can produce more waste than the rest of a campus site over the whole year, much of which can be reduced and/or recycled if correctly segregated as a result of a SWMP.

This is significant because there are national University KPIs linked with campus waste production which are linked to funding and league positions affecting applications.

Therefore this is a very important metric.

Without a solid methodology and mechanism like SWMPs— an alternative will be sought.

The regulations have been a useful tool for influencing contractors. For example SWMPs have given the institutions the opportunity to work with contractors up front, before work begins, to plan where waste goes. This would be more difficult without the SWMPs

Some contractors have been better than others in implementing and feeding back information. Those that want to keep sustainability at the heart of what they do will carry-on considering waste in some way, but the risk is that others will ignore it.

That said, SWMPs regulations were never fit for purpose. Following the letter of the law required obtaining more data than could be usefully acted upon. Another failing was inspecting/enforcing the regulations. Therefore it has been seen as onerous and could be managed more efficiently without the regulations via another mechanism. However scrapping the regulations completely shouldn't be the answer- more of a review of effectiveness is required.

5 The impacts of repealing the regulations have been identified in the impact assessment. Do you agree with the impacts identified there? Are there any that we have missed?

Please type your response here:

Now the processes are embedded they in essence should form part of each project without incurring any greater costs. The savings to businesses and the environment far outweigh any ongoing costs and any subsequent attempts to reuse or recycle the material.

Repealing the SWMP regulations will make it more difficult to collect data without the robust methodology which SWMPs provide. Without the SWMP legislation institutions would not be in a position to confidently report on data for projects.

The consultation claims that scrapping SWMPs will relieve bureaucratic burden on companies, leaving them free to pursue more productive avenues of waste management, e.g. training or using SWMP as a non mandatory tool. This plainly won't happen without some other driver to replace SWMPs. The larger construction (and waste) contractors will probably still have reasonably reliable waste data reporting, albeit maybe less detailed than at present, while smaller companies may stop collating waste data altogether.

6 If the regulations are repealed, would you continue to use Site Waste Management Plans in any form? Why?

Please type your response here:

As there is a requirement for construction waste data in the annual HESA EMR return, it is likely that institutions would specify some sort of data reporting at the tender / contract stage.

It is also likely that the requirement would be fairly stringent as institutions require to know the processing destination of waste materials as well as the desire to operate at best environmental practice - this suggests many will still continue to specify SWMP level requirements in the tender process.

For example some institutions have their own SWMP template, which they will continue to submit within tender documents.

However it is also noted that waste management companies provide tonnage data and for some institutions this will be enough.