

20<sup>th</sup> March 2008

## **Response to Defra on Informal consultation on non-statutory guidance for SWMPs**

The EAUC welcome the opportunity to comment on the non-statutory guidance and makes the following points:

1. We welcome the guidance and fully support the implementation of SWMPs on 6<sup>th</sup> April 2008.
2. The guidance is extremely useful and timely for the sector, particularly as it identifies the roles and responsibilities for producing, maintaining and signing-off SWMPs.
3. We were also pleased to see the importance the step-by-step-guide gives to waste minimisation from the start of a building project and not just at the construction stage. However, we still feel the title of 'Site Waste management Plans' gives the impression the plan only applies to the construction phase and not to resource issues earlier in the project.
4. We were pleased to see that a risk based approach to enforcement will be taken and will look for support/guidance from Local Authorities and/or the Environment Agency in the first instance.
5. We think the guidance should refer to the Code for sustainable homes, BREEAM and Considerate Contractor schemes and H&S procedures as a way to reinforce the need to embed SWMPs in building projects.
6. We believe that Duty of Care information, such as waste carrier licences, should be provided for all projects, regardless of cost and not just a requirement of projects costing £500k+.

We are the sustainable development champion for the HE/FE sector and see SWMPs as another tool to help our members reduce their environmental footprint. We have a key role in providing support and guidance to the HE/FE sector through training and support tools, newsletters etc.

We will disseminate best practice to help the sector adopt SWMPs as part of their building programmes. We also welcome the opportunity to work with government and its various agencies to promote the adoption of environmental best practice throughout the sector.

I am grateful to EAUC Trustee Dr Neil Smith of the University of Southampton for leading this consultation response.



**Iain Patton**  
Executive Director