

Mandatory digital waste tracking and reform to the carrier, broker, dealer regime

Wildlife and Countryside Link response

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Wildlife and Countryside Link is a coalition of 65 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This response is supported by the following Link members:

- Environmental Investigation Agency
- Friends of the Earth England
- Greenpeace UK
- Keep Britain Tidy
- Marine Conservation Society
- Whale and Dolphin Conservation
- WWF-UK

We recognise the benefit of these connected proposals for mandatory digital waste tracking and reform to the carrier, broker, dealer regime. While modest, these reforms, if coupled with increased and robust inspections, could improve standards in the waste industry and enable greater data collection to monitor compliance and minimise illegal activity. The current antiquated paper-based records system results in ineffective regulation and monitoring in many parts of the waste industry.

Background

These proposals come against a backdrop of the UK recording the world's second largest amount of plastic waste per person (99kg per person per year in 2016) and in 2020 reportedly exporting around 890,000 metric tonnes of plastic waste for recycling¹. We are producing and consuming quantities of plastic beyond what can be dealt with at a domestic level, and **the waste management sector has become structurally dependent on exporting plastic waste**. For instance, in 2019, the UK achieved a plastic packaging recycling rate of 49.6%, with 61% of plastic packaging exported for recycling². Defra estimates that around 210,000 tonnes of plastic waste

¹ <https://www.bpf.co.uk/roadmap>

² <https://www.recoup.org/p/380/uk-household-plastics-collection-survey-2020>

are exported each year from England to non-OECD countries. These shipments are destined for Hong Kong (36%), Malaysia (23%), Indonesia (13%), India (7%), Taiwan (7%), China (5%) and Pakistan (4%), amongst others³.

The Conservative Party made the welcome commitment to consult on a ban on the export of plastic waste to non-OECD countries in their 2019 Manifesto, though this will not prevent exports to OECD member Turkey, which has a recycling rate reported as 12%⁴ and is currently the largest receiving country of UK exported plastic waste. In 2020, annual shipments of UK plastic waste to Turkey alone stood at 209,642 tonnes, which is equivalent to 108 twenty-foot equivalent unit shipping containers per day.⁵ This trade can be characterised as a form of ‘waste colonialism’, with the UK dumping our waste on less well-developed countries which often have weaker regulations and legislation, that fall outside of UK jurisdiction, and with waste management systems that are as overwhelmed, if not more, than our own.⁶ Turkey, Malaysia, Vietnam and other countries have all been negatively impacted by our failing waste system.⁷

A perfectly managed and transparent secondary raw material trade system could, in theory, align supply and capacity and lead us to a global circular economy. However, the on-the-ground reality of the global plastic waste trade⁸ is a stark reminder that this is not yet a possibility due to the continued chronic overproduction of plastic, plastic waste leakage and mismanagement in both producing and receiving countries (leading to environmental social and human health harm)⁹. Furthermore, the waste trade is exploited by a multiplicity of actors, including organised criminals, corrupt officials, and unscrupulous traders.¹⁰ Domestically, research by Material Focus has found that nearly two-thirds (63%) of businesses offering to handle waste

³ <https://www.letsrecycle.com/news/mps-told-penalties-for-illegal-exports-are-too-low/>

⁴ <https://www.theguardian.com/environment/2021/may/17/uk-plastics-sent-for-recycling-in-turkey-dumped-and-burned-greenpeace-finds>

⁵ <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

⁶ See https://www.greenpeace.org.uk/wp-content/uploads/2021/05/Trashed-Greenpeace-plastics-report-final.pdf?_ga=2.23286268.791352838.1646304967-86202489.1641916703

⁷ <https://www.theguardian.com/environment/2021/dec/31/waste-colonialism-countries-grapple-with-vests-unwanted-plastic> and <https://eia-international.org/report/the-truth-behind-trash-the-scale-and-impact-of-the-international-trade-in-plastic-waste/>

⁸ In addition to the Basel Convention’s guiding principles (the proximity principle) and overall obligation to ensure that transboundary movements of hazardous and other wastes are minimised and that any such movement is conducted in a manner which will protect human health and the environment

<http://www.basel.int/Implementation/Controllingtransboundarymovements/Overview/tabid/4325/Default.aspx>

⁹ <https://eia-international.org/report/the-truth-behind-trash-the-scale-and-impact-of-the-international-trade-in-plastic-waste/>

¹⁰ <https://www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime>

appear to be unregistered in England.¹¹ And in 2021 the EU reported that the UK's illicit waste market is estimated to be worth up to £3.7 billion – at least double that of any other European state.¹²

A detailed assessment of the illegal trade in plastic waste by the International Criminal Police Organisation (INTERPOL) showed that illegal trade is significant and on the rise, particularly since 2018, as organised criminal groups have exploited the disruption caused by China's ban on plastic waste imports.¹³ We also note the EA's National waste crime survey report¹⁴ which states; "The waste industry perceives waste crime to be endemic, they believe it is on the rise, and that the deterrents for active and would-be waste criminals are not strong enough." The CEO of the EA has recently made a vital intervention on waste exports, saying: "Sending certain kinds of waste abroad is legal, but is it right?" stating that "I think we should set ourselves the challenge then of getting as soon as possible to a position where we process all our waste at home and end all waste exports."

It has now become an imperative for the Government to match this ambition and send clear signals to the sector that waste crime will no longer be tolerated. And, in alignment with the comments from the EA's CEO, we would challenge that although waste exports are indeed legal, does that mean that they're morally acceptable or have we become desensitised to an unacceptable form of "waste colonialism"?

So, it is within the context of a waste sector structurally dependent on the unethical practice of waste exports, and the (related) shocking prevalence of waste crime, both of which lead to environmental and social harms, that our response to these proposals has been written.

The need for comprehensive reform

Our response focuses on the key principles which should be adopted through all of these reforms, highlighting the necessity of much more comprehensive changes to how we source and consume the world's resources and how we manage the waste arising from our consumption.

Overall, we do not believe these reforms will deliver the urgently required improvements on illegal waste practices that are promised. The tracking consultation

¹¹ <https://eq3pi6tq2z7.exactdn.com/wp-content/uploads/2021/07/An-Independent-Study-into-Fly-tipping-and-Unregistered-Waste-Carriers-in-England-FINAL.pdf>

¹² <https://op.europa.eu/en/publication-detail/-/publication/ab3534a2-87a0-11eb-ac4c-01aa75ed71a1/language-en>

¹³ See <https://eia-international.org/wp-content/uploads/EIA-The-Truth-Behind-Trash-FINAL.pdf>

¹⁴ <https://www.gov.uk/government/publications/national-waste-crime-survey-report-2021-findings-and-analysis>

states that these changes will make it ‘much harder’ for rogue operators to compete in the industry and commit waste crimes including fly tipping, deliberate misclassification of waste, illegal waste exports and the operation of illegal waste sites.

While these reforms will provide useful tools for regulators attempting to address these damaging practices, they fail to tackle the underlying structural issues driving the high levels of waste (especially plastics) produced within the UK nor the associated illegal activities. Indeed, assessing the current proposals and the Government’s wider policy programme, we have identified the following concerns that will hinder attempts to clean up the sector:

- **Waste exports are currently incentivised over domestic recycling**

Despite these current proposals, with so much waste exported, a lack of investment in scaling up domestic waste infrastructure and ever diminishing inspection and monitoring activity, ensuring compliance will remain a challenge. Switching from paper-based to digital records does not remove the risk of misclassification when the incentives are so high, particularly given recent legislative developments, including industry representatives stating that the introduction of the UK plastic packaging tax could increase plastic exports.¹⁵ The problem emerges because high levels of waste exports are linked to the market based mechanisms that producers use to offset packaging they place on the market as per producer responsibility requirements for packaging; through Packaging Recovery Notes (PRNs) and Packaging Export Recovery Notes (PERNs).

The National Audit Office has warned that recovery notes can reward shipping waste overseas rather than end-of-life treatment at home.¹⁶ Because it is assumed that plastic waste achieves a 100% recycling rate upon export, this approach is advantaged over domestic recycling, where it is likely that even the best UK recycling facilities are unable to achieve rates of 100%. Even if a UK facility’s generated recovery rate was 90% (which is considered very good), there is still a 10% financial disadvantage compared to facilities where waste is exported for recycling, where rates of recycling are all assumed to be 100%. Of the limited data available, recycling efficiencies at waste facilities in developing countries can realistically be as low as 17%.¹⁷ This serves as a de facto subsidy for exporting waste, with the lower standard of proof required compared to domestic recycling acting as an additional incentive.

¹⁵ <https://eandt.theiet.org/content/articles/2022/03/plastic-packaging-tax-could-increase-plastic-exports-warn-experts/>

¹⁶ <https://www.bloomberg.com/graphics/2022-tesco-recycle-plastic-waste-pledge-falls-short/>

¹⁷ <https://eia-international.org/wp-content/uploads/EIA-The-Truth-Behind-Trash-FINAL.pdf>

Disincentives from fines also fail to deter illegal activity. There is a low likelihood of being caught and fines can be significantly less than profits made from the illegal activity.¹⁸

Given the Government's recent response to the packaging Extended Producer Responsibility (EPR) reforms consultation, which has resulted in a watering down of the original proposals and a delay to implementing modulated fees, the PRN/PERN system will remain in place until 2024. And, unless the existing system is significantly strengthened and exports disincentivised as part of the interim changes, the system will not address waste exports nor illegal activities in the near future.

- Reduction is not prioritised or adequately reflected in either consultation

Our current approach to waste fails to address the underlying drivers of our high consumption, single-use, throwaway society which ultimately results in the offshoring of our waste and the accompanying illegal activity. Successful waste prevention and reduction requires policies which explicitly target reductions in overall resource use. Without these, the Government maintains the status quo of unsustainable consumption (the world is still only 8.6% circular¹⁹) and while we must drive up recycling, we need to focus on reduction and reuse as the higher priority.

Alongside this, the elimination of hard to recycle plastics is critical. This is particularly important for soft plastics which, even when deemed “recyclable”, are likely to be contaminated and will therefore end up in landfill or incineration. Items such as sweet wrappers and dirty pet-food pouches can be especially problematic, with recycling professionals having noted the particular difficulty of reprocessing these items.²⁰ The Government recently consulted on banning single use plastic plates, including plastic bowls and trays, plastic cutlery, plastic balloon sticks and expanded polystyrene (EPS) food and beverage containers as well as asking for evidence on banning other problematic items. We support moves to ban these “low-hanging fruit” items but also maintain that there should be an overarching systematic policy of targeted reduction, rather than ad hoc bans.²¹

It is vital that EPR reforms are ambitious and go beyond incentivising recycling only, by shifting consumption away from single use items. Without this increased ambition, these measures risk being outdated before their introduction. Furthermore, the proposed residual waste reduction target and the absence of a resource productivity-

¹⁸ <https://www.letsrecycle.com/news/mps-told-penalties-for-illegal-exports-are-too-low/>

¹⁹ <https://www.circularity-gap.world/2021>

²⁰ <https://www.bloomberg.com/graphics/2022-tesco-recycle-plastic-waste-pledge-falls-short/>

²¹ See

https://www.wcl.org.uk/docs/assets/uploads/WCL_Commonly_Littered_Items_Consultation_response.pdf

related in the Environment Act risks incentivising landfill and incineration, rather than addressing unsustainable resource consumption. This also means that the proposed target will not capture the problem of waste exports which will continue to be reported as 'recycled'.

It stands to reason that reducing our overall resource consumption which, in turn, would result in a reduction in residual waste, should remain a key pillar in shifting the drivers of waste exports and illegal activity.

- **Domestic recycling capacity is inadequate**

Because of the stalled waste reforms and with the UK still lacking domestic recycling capacity, high levels of waste will continue to be exported or disposed incorrectly through fly tipping, incineration or misclassification for landfill. We call for the Government to adhere strictly to the waste hierarchy and the producer pays principle, supported by a clear investment strategy to increase domestic mechanical recycling capacity.

Mandatory digital waste tracking and CBD reform

Turning to the specific proposals in the consultations, we have identified the following concerns:

- **Insufficient funding for the EA**

Regarding reform of the CBD regime, the Impact Assessment states that the Environment Agency (EA) will face transition costs associated with new IT (£1m), communication campaigns (£0.1m) and familiarisation costs (£0.01m); and ongoing costs associated with enforcement (£3m) and managing 'registered exemptions' (£2m). For waste tracking, in order to make full and effective use of the new data, extra resources for analysis and enforcement will also be essential. However, the EA has consistently struggled to deliver its responsibilities effectively due to insufficient financial resources.

The EA themselves have highlighted threats to their enforcement budget, with the National Waste Crime Survey report 2021 stating: "As the scale and cost of criminality within the waste sector rapidly increases, the EA continues to see threats to its enforcement budget. Without appropriate funding, the challenge of fighting waste crime will grow, the impacts will increase, and those trying to operate within

the regulations will find it increasingly difficult to do so.”²² ²³ Without considerably greater EA resources dedicated to analysis and enforcement, digital data covering the 200 million tonnes of waste produced in the UK each year may simply languish in a Government database, thereby squandering the potential use of this data to tackle waste crime.

- **Transparent and real-time data**

We strongly urge the Government to make this waste tracking data publicly accessible online. The public has the right to know where its waste ends up, and traceability and transparency will be a powerful tool for exposing system leakages and irresponsible and environmentally unsound waste management. The UK system would ultimately benefit from real-time, online reporting systems accessible by all stakeholders. A harmonised and standardised electronic system for shipments based on prior, informed consent would avoid the burden of paper-based documentation.²⁴ This is not dissimilar to other sectors that have adopted a “positive release” approach in relation to their goods and services e.g. retailer product quality systems.

The consultation asks about real time tracking and we believe there shouldn’t be a problem in requiring this. If there are concerns about data quality, industry is capable of retrospectively checking the validity of data and revising accordingly, with any changes to data made public. Considering how far in advance information about waste movements should be available due to contractual agreements, we believe that it could be entered into the system 3 days or more in advance. Indeed, in general more information could be provided well in advance of shipments. Early access to this information could help regulators identify and intercept illegal activity and could serve to better monitor waste flows, thereby supporting the UK’s ambition to eliminate avoidable waste by 2050.²⁵

Data should include enhanced detail on waste categories to determine the nature of wastes entering the system. With co-mingled or source separated recycling collections, for example, waste tracking can help determine which of these has the best outcomes. This approach would be especially beneficial for higher value and

²² <https://www.gov.uk/government/publications/national-waste-crime-survey-report-2021-findings-and-analysis>

²³ The Wildlife and Countryside Link submission to the Comprehensive Spending Review last year called for an additional £60m per annum for the Environment Agency to carry out its basic duties of advice and enforcement. <https://www.wcl.org.uk/docs/BRIEFING%20-%20A%20CSR%20for%20Nature%20and%20People%2030.09.21.pdf>

²⁴ See <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

²⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

bulkier products containing precious materials which could be recovered and repurposed, e.g. rare earth metals in e-waste.

- **Alignment with the waste hierarchy**

The Waste (England and Wales) Regulations 2011 place a duty on waste holders to take all measures reasonable in the circumstances to apply the waste hierarchy on the transfer of waste. For the electronic waste tracking system, we believe there should be a justification box, where waste holders must demonstrate they have explored the treatment options further up the hierarchy prior to opting for the requested outcome. This would ensure waste holders have genuinely considered the viability of waste hierarchy priorities, and the failure to adhere with this would lead to appropriate punitive action by regulators.

The Government should recognise the challenges faced by local authorities in applying the waste hierarchy where many years of central Government grant reductions have reduced their ability to fund proactive circular economy activities. The Government should support all LAs to create 'circular economy hubs' so there is no excuse for waste holders not to operate further up the hierarchy. As outlined in the Waste Prevention Programme for England, this could be delivered through the use of funds from EPR schemes to support local 'circular economy hubs'.²⁶

Considerations should also be given to how the new tracking system can assist in limiting waste movements, reducing 'waste miles'. There is the potential for tracking data to help monitor whether items are reused or reprocessed locally. Policies to promote reuse in the same areas where waste arises can develop more jobs, with research estimating that the Government could help to create over 450,000 jobs in the circular economy by 2035.²⁷

- **Capture meaningful and actionable information into the tracking system**

We believe that the digital tracking system could be improved with the addition of more information which could offer greater insights to regulators. Given the difficulty in auditing containers of waste once they have been loaded and transported, consideration should be given to including a requirement in the waste tracking system of images or CCTV of a container being packed. This would be linked to the specific shipment on the system, allowing regulators to view what has been placed in

²⁶ https://consult.defra.gov.uk/waste-and-recycling/waste-prevention-programme-for-england-2021/supporting_documents/Waste%20Prevention%20Programme%20for%20England%20%20consultation%20document.pdf

²⁷ https://green-alliance.org.uk/wp-content/uploads/2021/11/Levelling_up_through_circular_economy_jobs.pdf

a container. This could supplement in-person inspections, which remain vitally important and should be increased.

- **Improved outcomes from waste/product flow monitoring**

The new waste tracking system raises the possibility of incorporating into it a comprehensive passport for products. The Government's Waste Prevention Programme for England (WPP) proposes a product passport which captures "*material constituents of products to facilitate more effective recovery and reuse of their materials*". Additionally, Green Alliance's "Design for a Circular Economy" report²⁸ recommends the following priority information should be covered within that passport:

- Environmental footprint
- Hazardous substances or chemical composition
- Critical raw material content
- Repair information
- Information on social impact and due diligence

Building on the WPP and Green Alliance's proposals, and capitalising on the waste tracking proposals, we believe the passport could feasibly include information about a product's optimum end of life scenario and further facilitate analysis to determine if a product's lifespan has been maximised, the number of repair cycles, whether it has been repurposed or remanufactured and whether its ideal end-of-life outcome has been achieved.

Furthermore, EPR fee modulation could reflect this real-world analysis, for example the fees for particular groups of products which may be deemed recyclable but aren't recycled in reality could increase based on this evidence. This establishes a clear link between mandatory waste tracking efforts driving upstream changes and the proposed Environment Act targets. The concept of product passports is not new - for example car ownership documentation (log books) provides a history of reselling / repurposing, iPhone ownership is logged via unique codes. The technology to facilitate product traceability exists and could be leveraged in this sector to deliver more positive outcomes.

The case for wider reform:

While these problems are substantial and will require strong political will to be tackled effectively, we believe there are opportunities for the UK to be world-leading in this area by setting a powerful international example of an evidence-based, more

²⁸ https://green-alliance.org.uk/resources/Design_for_a_circular_economy.pdf

circular consumption system. Increased materials circularity and increased transparency of global material flows could also support resilient resource supply chains. For instance, by driving down our reliance on single-use plastics and increasing the use of recycled materials, we can reduce our reliance on international markets for oil and gas and help combat climate change. The IEA states petrochemicals are becoming the largest driver of global oil consumption (nearly 1/2 of 2050 oil demand) and that plastic is the fastest growing petrochemical material.²⁹ Plastic reduction is therefore crucial for reducing waste, tackling climate change and cutting resource use.

In relation to the waste trade, we recommend the following as the most effective measure to solve the problems outlined above:

- **Start with a ban for the export of plastic waste³⁰**

The Conservative Party committed to consulting on a ban with regard to the export of plastic waste to non-OECD countries in 2019, and repeatedly pledged to uphold environmental standards post-Brexit.³¹ Yet, after transposing the Basel plastic waste amendments in 2021, the UK is still allowing plastic waste to be exported to non-OECD countries, including contaminated, unsorted and difficult-to-recycle plastic waste [Y48 category]. Despite clear recognition of harm and mismanagement³², these shipments are still permitted under current UK regulations.

Yet even if the Government were to follow through on this commitment, 79% of UK waste currently goes to countries that are in the OECD (such as Turkey - currently the biggest export market for the UK's plastic waste) so the negative impacts of plastic waste exports on these countries would persist.³³ The UK has so far failed to follow the EU's lead in prohibiting Y48 plastic waste exports to non-OECD countries, but we still have the opportunity to match and even exceed EU ambition as part of upcoming legislative revisions. Parties to the Basel Convention are to follow the Convention's guiding principles, which includes the Proximity Principle, whereby waste should be managed as close as possible to the point of generation.

²⁹ https://iea.blob.core.windows.net/assets/bee4ef3a-8876-4566-98cf-7a130c013805/The_Future_of_Petrochemicals.pdf

³⁰ Please note that this does not include the export of high quality secondary raw plastic material

³¹ The Conservative and Unionist Party (2019). Get Brexit Done: Unleash Britain's Potential. The Conservative and Unionist Party Manifesto, p.43. Available at: https://assets-global.websitefiles.com/5da42e2cae7ebd3f8bde353c/5dda924905da587992a064ba_Conservative%202019%20Manifesto.pdf

³² <https://eia-international.org/report/the-truth-behind-trash-the-scale-and-impact-of-the-international-trade-in-plastic-waste/>

³³

https://webcache.googleusercontent.com/search?q=cache:ZbjlMKxeP_sJ:https://www.endsreport.com/article/1707873/mapped-uks-plastic-waste-exports+&cd=1&hl=en&ct=clnk&gl=uk

The stark reality is that the current plastic waste trade acts as a means of externalising the true costs of overconsumption and serves to perpetuate socio-economic inequalities by placing the responsibility of waste management onto developing economies who were not the original generators of the plastic waste in question. All this results in negative environmental, social and human health impacts – something that is incompatible with genuine circular economy principles. The UK risks not fulfilling its commitment to become a circular economy³⁴ if it continues to export its plastic waste.

It is therefore essential that the UK bans plastic waste exports, including an immediate ban of all plastic waste exports to non-OECD countries as per the powers in the Environment Act, and a ban on non green-listed plastic waste to OECD countries (with a phased-in total prohibition). These measures must be accompanied by concerted efforts to reduce the amount of single-use plastics consumed and increased investment in domestic recycling infrastructure technologies which does not have perverse consequences. In relation to any exemptions, these should be limited to exceptional circumstances and subject to robust controls to ensure environmentally sound management.³⁵ This ban should be coupled with a moratorium on new incineration capacity and the introduction of an escalating incineration tax.³⁶

Conclusion

While there are benefits to these reforms for the intra-UK waste management system, the greatest benefits would arise from tackling both legal plastic waste exports and the apparently booming illegal waste export trade through an export ban.

With the UK having taken a leading role in negotiations at the United Nations Environment Assembly in Nairobi to secure a legally binding instrument covering the full lifecycle of plastics with the goal to “End Plastic Pollution,”³⁷ it must demonstrate the same ambition domestically around plastic waste.

Overall, the key principles which must be embedded in these reforms are the importance of reducing resource consumption and waste, eliminating problematic and hard-to-recycle formats and materials (including many plastic product formats),

³⁴ <https://www.gov.uk/government/publications/circular-economy-package-policy-statement/circular-economy-package-policy-statement>

³⁵ <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

³⁶ <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

³⁷ https://wedocs.unep.org/bitstream/handle/20.500.11822/38522/k2200647_-_unep-ea-5-l-23-rev-1_-_advance.pdf?sequence=1&isAllowed=y

sorting and mechanically recycling plastic waste in the UK, and banning plastic waste exports. The Basel Convention states that “Nothing in this Convention shall prevent a Party from imposing additional requirements that are consistent with the provisions of this Convention, and are in accordance with the rules of international law, in order better to protect human health and the environment”.³⁸ The UK therefore has the opportunity to go beyond compliance and demonstrate world leadership on this issue.

Given the climate and nature emergencies and persistent evidence of UK waste polluting the natural environment across the world, and despite operating within the confines of the law, the system is clearly both unethical and broken. With the increased need for sustainable resource consumption, the spiralling costs of transport and the need to tackle the illicit waste trafficking emergency, fundamental system change is needed.

To address this waste colonialism, the Government urgently needs to end the export of UK plastic waste. It is unacceptable that the UK is shipping its waste around the world and it is unacceptable that the current CBD regime and the opaque, paper-based waste tracking system are resulting in pollution both domestically³⁹ and abroad. Reform to the CBD regime and digital waste tracking systems can act as a first step to help us deliver the moral obligation to clean up our act, demonstrating international leadership on the environment.

For more information on this response please contact Link’s policy officer Matthew Dawson on matthew@wcl.org.uk

³⁸ Annex 11 - <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52021SC0331&from=EN>

³⁹ <https://www.theguardian.com/commentisfree/2021/nov/24/waste-dumping-uk-environment>