

# Waste Compliance Self-Audit Checklist

Version 3 – DWTS-ready client issue • April 2026



## Digital Waste Tracking - mandatory from October 2026

From October 2026, permitted waste receiving sites in England, Wales and Northern Ireland are expected to record incoming waste digitally through the Environment Agency Digital Waste Tracking Service. Receipt data must be submitted within 2 working days. This checklist helps identify whether current site controls, records and classifications are ready for that level of visibility.

**How to use this checklist:** Answer Yes, Partial or No for each question. The aim is not to pass a paper exercise. The aim is to identify issues that could become visible once DWTS goes live. Takes around 20 minutes.

Site: \_\_\_\_\_ Date: \_\_\_\_\_ Completed by: \_\_\_\_\_ Role: \_\_\_\_\_

## 1. Technical Competence (TCM / WAMITAB)

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Do you have a named Technically Competent Manager for each permitted activity?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is their WAMITAB / CoTC qualification current and valid for your permit type?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Have they completed Continuing Competence within the last 2 years?              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a documented plan for TCM cover during absence, sickness or departure? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Would the operation remain compliant if the TCM left with immediate effect?     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## 2. Environmental Permits

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Do you hold valid environmental permits for all waste activities on site?                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are the permits up to date and reflective of current operations?                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Have you reviewed whether recent changes require a permit variation?                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is your annual subsistence fee paid and up to date?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are copies of all permits accessible on site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Have accepted waste types and EWC codes been compared with permit scope ahead of DWTS visibility? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### 3. Duty of Care & Documentation

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Are Waste Transfer Notes issued and retained for all non-hazardous waste movements?                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are Consignment Notes correctly completed for hazardous waste movements?                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do you verify that all carriers and receiving sites hold valid licences or permits?                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are waste descriptions accurate and using correct EWC codes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are records retained for the legally required minimum periods?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are EWC code assignments reviewed against actual waste received rather than copied from historic records? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### 4. Site Management & Operations

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Is waste stored in accordance with permit conditions covering type, quantity and duration?              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are site infrastructure and containment controls maintained, including drainage, bunding and surfacing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do you have a written management system covering permitted activities?                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are staff trained and aware of their responsibilities under the permit?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Would housekeeping satisfy an unannounced EA inspection?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### 5. Monitoring, Records & Reporting

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Are you completing monitoring required by the permit, such as emissions, noise or dust? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are waste acceptance procedures documented and followed?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do you submit required returns to the EA on time?                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the site diary or operational log kept up to date?                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Question   | Yes                      | Partial                  | No                       |
|--|--------------------------|--------------------------|--------------------------|
| Could you produce a complete audit trail for any waste movement in the last 12 months?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Can the current weighbridge or gate-entry process capture EWC code, SIC code, carrier registration, origin, tonnage and waste description for every incoming load? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### 6. Emergency Preparedness

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Do you have an up-to-date accident management plan or fire prevention plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Has it been reviewed in the last 12 months?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do staff know what to do in the event of pollution incident or fire?        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are emergency contact numbers displayed and current?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Would you be confident handling an EA enforcement visit today?              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### 7. DWTS Readiness - October 2026

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Have you registered, or planned registration, for the Environment Agency Digital Waste Tracking Service?                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the annual DWTS service charge budgeted and a named responsible person identified?                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Have you decided whether data will be submitted through software/API integration or spreadsheet upload route?             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Can the site consistently submit waste receipt data within 2 working days of waste arriving?                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| If using weighbridge or waste management software, has the vendor confirmed DWTS compatibility and implementation timing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do you have a documented gate refusal protocol for waste outside permit scope, including weighbridge operator training?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Question  | Yes                      | Partial                  | No                       |
|---|--------------------------|--------------------------|--------------------------|
| Do you have a procedure for identifying POPs-containing waste and correctly classifying mirror-entry waste streams? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## Scoring and next action

| YES total: ____ / 40   | PARTIAL total: ____ / 40   | NO total: ____ / 40   |
|--|--|---|
| <b>33-40 Yes</b>   | <b>24-32 Yes</b>   | <b>Below 24 Yes</b>   |
| Strong position. Maintain controls, confirm DWTS registration and test the chosen submission route before go-live. | Usable base, but gaps need ownership. Prioritise Partial and No answers in Sections 2, 3, 5 and 7. | Material compliance risk. A structured readiness review is recommended before DWTS makes gaps more visible. |

### DWTS readiness sub-score

Section 7 should also be scored separately because DWTS creates a fixed external deadline.

| 6-7 Yes  | 4-5 Yes   | Below 4 Yes  |
|--|---|--|
| DWTS-ready. Confirm registration, assign responsibility and run a test submission. | Partial readiness. Assign gap owners and agree a remediation plan before August 2026. | Not ready. Immediate action required. A DWTS Readiness Audit is the quickest route to a defensible position. |

### When to use IWS

If your score is below 33, or your DWTS sub-score is below 6, IWS can carry out a DWTS Readiness Audit.

Typical output: gap list, permit-scope risk review, DWTS readiness score, remediation priorities and a practical action plan.

The audit is designed to identify issues before they become visible through live DWTS records.

## Why this matters

| Issue   | Why it matters   |
|---|--|
| <b>TCM is a legal requirement</b>                 | Every permitted waste site must have suitable technical competence. Loss of cover can quickly become a permit breach.  |
| <b>Permit scope matters</b>                       | Accepted waste types, quantities and activities must match permit conditions. DWTS increases visibility of mismatches. |
| <b>Classification must be defensible</b>          | EWC codes, mirror entries, POPs and waste descriptions need active review, not historic copy-and-paste.                |
| <b>Records become live evidence</b>               | Digital records will become the operating audit trail. Errors may be visible far sooner than under paper systems.      |
| <b>Fire and emergency controls remain central</b> | Fire prevention, pollution incident response and site housekeeping remain key EA enforcement triggers.                 |
| <b>DWTS changes timing</b>                        | The main shift is not just paperwork. It is faster visibility, faster challenge and less tolerance for unclear data.   |

### Need help closing the gaps?

Innovation Waste Services provides outsourced compliance support to permitted waste operators, including TCM cover, compliance audits, permit management, EA inspection readiness and DWTS Readiness Audits ahead of the October 2026 deadline.

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This checklist is for general guidance only and does not constitute legal advice. Always refer to your specific permit documentation and the latest Environment Agency guidance on Digital Waste Tracking.