IWS DWTS Readiness Checklist

Version 4 – DWTS-ready client issue • October 2026

IWS PERMITTING & COMPLIANCE

Digital Waste Tracking - in force since 1 October 2026

Since 1 October 2026, permitted and licensed waste receiving sites in England and Wales have had to record incoming waste digitally through the Digital Waste Tracking Service. Receiving sites in Scotland and Northern Ireland follow from 1 January 2027. 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 are now visible through live DWTS records. 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?	☐	☐	☐
Is their WAMITAB / CoTC qualification current and valid for your permit type?	☐	☐	☐
Have they completed Continuing Competence within the last 2 years?	☐	☐	☐
Is there a documented plan for TCM cover during absence, sickness or departure?	☐	☐	☐
Would the operation remain compliant if the TCM left with immediate effect?	☐	☐	☐

2. Environmental Permits

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

3. Duty of Care & Documentation

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

4. Site Management & Operations

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

5. Monitoring, Records & Reporting

Question	Yes	Partial	No
Are you completing monitoring required by the permit, such as emissions, noise or dust?	☐	☐	☐
Are waste acceptance procedures documented and followed?	☐	☐	☐
Do you submit required returns to the EA on time?	☐	☐	☐
Is the site diary or operational log kept up to date?	☐	☐	☐

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

6. Emergency Preparedness

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

7. DWTS Readiness - October 2026

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

Question	Yes	Partial	No
Do you have a procedure for identifying POPs-containing waste and correctly classifying mirror-entry waste streams?	☐	☐	☐

Scoring and next action

YES total: ____ / 40	PARTIAL total: ____ / 40	NO total: ____ / 40
33-40 Yes	**24-32 Yes**	**Below 24 Yes**
Strong position. Maintain controls, confirm DWTS registration and check the chosen submission route is working.	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 now.	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
TCM is a legal requirement	Every permitted waste site must have suitable technical competence. Loss of cover can quickly become a permit breach.
Permit scope matters	Accepted waste types, quantities and activities must match permit conditions. DWTS increases visibility of mismatches.
Classification must be defensible	EWC codes, mirror entries, POPs and waste descriptions need active review, not historic copy-and-paste.
Records become live evidence	Digital records are now the operating audit trail. Errors may be visible far sooner than under paper systems.
Fire and emergency controls remain central	Fire prevention, pollution incident response and site housekeeping remain key EA enforcement triggers.
DWTS changes timing	The main shift is not just paperwork. It is faster visibility, faster challenge and less tolerance for unclear data.

Need help closing the gaps?

IWS Permitting & Compliance provides outsourced compliance support to permitted waste operators, including TCM cover, compliance audits, permit management, EA inspection readiness and DWTS Readiness Audits.

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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.