

Risk Register 25/3/20

ID	Date raised	Type	Risk description	Mitigating/Contingent action	Govt Regulatory Position
1	17/3	Contract Issues	Disruption of business as usual resulting breaches of contracts.	<p>Ensure that temporary provision is in place to relieve operators from contractual performance penalties with the local authorities it serves, during this pandemic. For now, the industry must focus on keeping services running, and not on meeting contractual targets.</p> <p>On recycling targets or collections etc, making sure contract penalties can be set aside in the emergency</p> <p>On operating availability etc that might be applied</p> <p>Considerations of MBT operations on residual waste, especially those that use bio-drying</p>	Raised with Defra and EA
2	17/3	Logistics	Staff shortages mean not enough drivers to carry out waste collections	<p>At the moment there is no exemption permitted for waste carriers from the Traffic Commissioner for waste carriers, exemptions have already been allowed for some emergency services in line with what happened in the foot & mouth crisis so we should carry on pushing for exemptions for our industry as an essential service. We would want extensions to daily and weekly driving hours.</p> <p>Seek relaxation of driver hour requirement in line with retail sector agreement.</p>	<p>Relaxation of MOTs for heavy vehicles https://www.gov.uk/government/news/driving-tests-and-mots-for-heavy-vehicles-suspended-for-up-to-3-months-to-help-tackle-spread-of-coronavirus</p> <p>Key workers can undertake driving tests - confirmed.</p>
3	17/3	Logistics	Vehicle Maintenance – Testing Staff shortages mean unable to undertake vehicle maintenance checks for non safety critical items.	<p>As an industry we should push hard for exemptions on 6 weekly vehicle testing as this will close our operations as quickly as anything else. Separately we should challenge the Traffic Commissioner should MOT testing centres close and we are unable to test vehicles. .</p>	<p>Relaxation of MOTs for heavy vehicles https://www.gov.uk/government/news/driving-tests-and-mots-for-heavy-vehicles-suspended-for-up-to-3-months-to-help-tackle-spread-of-coronavirus</p>
4	17/3	Logistics	Congestion Zone charge relaxation If collection frequency changes are made for residual waste	<p>Seek reduction/exemption for congestion charges</p>	<p>TfL suspends all road user charging schemes to help critical workers</p> <p>https://tfl.gov.uk/campaign/coronavirus-covid-</p>

5	17/3	Logistics	Insufficient drivers / staff to operate facilities	<p>Seek "key worker" status for staff in critical roles from Govt</p> <p>Agree possible relaxations of driver hours limitations for collections and deliveries of waste and intermodal movements.</p>	<p>Confirmed - waste sector Key Workers.</p> <p>https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-educational-provision/guidance-for-schools-colleges-and-local-authorities-on-maintaining-educational-provision</p>
6	17/3	Logistics	Disruption of fuel supplies meaning waste collections inter modal and key handling and treatment plant operations disrupted.	<p>Prioritise the sector as a critical industry to ensure the continuation of supplies necessary for it to keep operating, such as fuel.</p> <p>Seek priority status is fuel supplies rationed/disrupted</p>	<p>Raised with Defra as a key priority and in dialogue.</p>
7	17/3	Logistics	Lack of staff resulting in disruption to leachate movements	<p>Driver hours changes and operating hour changes to allow continued movement</p> <p>Temporary relaxation of on site storage limits (in site) if leachate cannot be moved.</p> <p>Relaxation of Waste water (Sewage) acceptance limits</p>	<p>Raised with EA and Defra</p>
8	17/3	Site Issues	Insufficient staff to deliver COTC cover and monitoring duties	<p>Seek "key worker" status for staff in critical roles from Govt</p> <p>Agree flexibility to maintain operations if we have insufficient COTC cover.</p> <p>Lack of staff to undertake monitoring duties, relaxations of frequencies, with prioritised approach</p>	<p>Key Worker status granted https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-educational-provision/guidance-for-schools-colleges-and-local-authorities-on-maintaining-educational-provision</p> <p>Clarification from EA obtained from Jill Rooksby</p>
9	17/3	Site Issues	Disruption results in increased storage of waste	<p>Possible relaxation of site storage rules (including FPP's) if movement of waste is constrained (TFS, EFW etc)</p>	<p>Raised with EA and Defra</p>
10	17/3	Site Issues	Lack of capacity for dealing infectious waste.	<p>ESA to send Defra a list of permits in the system that relate to processing capacity and would be useful to be processed now. Defra will then flag this list to EA colleagues</p> <p>The possible need for MSW plants to temporarily accept infectious waste (EWC code restriction relaxations)</p>	<p>Raised with EA and Defra.</p> <p>RPS in discussion.</p>
11	17/3	Site Issues	Disruption of normal operations means that facilities have to extend opening.	<p>Delivery time restriction relaxations (planning / permit)</p>	<p>Raised with EA and Defra</p>

12	17/3	Site Issues	Disruption of BAU to EFW operations	<p>Re-start fuel priority (as fuel point above)</p> <p>Essential chemicals – prioritisation for access to stocks and supplies to allow continued operations (for flue gas cleaning for instance)</p> <p>EWC code relaxations and operating instructions on handling etc (common guidance)</p> <p>Delivery time relaxations (to allow residual waste to be delivered over longer periods or 24hrs if required)</p> <p>Potential lack of transport capacity for movement of APC residues.</p> <p>Relaxation on input tonnages if the plants have capacity to treat more residual waste than permitted (such as those going through or seeking changes for CV differences to design).</p> <p>Complete an assessment of the capability of landfills to take waste if ERFs are forced to close</p> <p>Review Outage plans against critical path to identify 'show stoppers 'to focus on critical items for safety / continued operation only and risk-assess the supply chain</p>	<p>Raised with Defra and EA</p> <p>ESA provided a list of 'essential chemicals' to satisfy Defra request made on 24/03 .</p>
13	17/3	Specific Waste Issues	Disruption of BAU results in lack of demand for IBA from construction industry	<p>Possible need to increase storage (construction activity reduces), including offsite storage with appropriate measures to reduce risk to people and the environment.</p> <p>Possible relaxation on testing regimes if staff need to be prioritised to other duties.</p> <p>If we needed to landfill IBA (other options exhausted) could landfill tax be determined at zero or at worst non-active.</p>	<p>Raised with EA and Defra.</p> <p>RPS in discussion for extension.</p>
14	17/3	Specific Waste Issues	Disruption of BAU results in difficulties handling SRF	<p>Suspension of FPP limits on waste storage at EA sites to cater for backup of SRF and Haz Waste.</p>	<p>Raised with EA and Defra</p>
15	17/3	Specific Waste Issues	Disruption of BAU results in difficulties in hazardous waste management Solvents, oily rags, residues such as oily filter cakes, old stock	<p>Allow additional storage with appropriate risk management at permitted facilities.</p> <p>Allow extended operating hours/permit limits for treatment and disposal facilities.</p>	<p>Raised with EA and Defra</p>

16	17/3	Site Issues	Disruption of BAU results in increased volumes of waste stored at facilities.	Allow storage of more benign wastes, DMR, Lead, Oil on non-licenced third party sites	Raised with EA and Defra
17	24/3	Site Issues	Laboratory staff not available to support site operations such gas, water, leachate monitoring	Classify essential laboratory and supporting staff (couriers etc) as Key Workers. Possible relaxation of permit requirements to take account of situation	24/03/20 Defra confirmed that sub-contractors/third parties which are essential to the continued operations of waste facilities fall under the classification of key workers.
18	24/3	Site Issues	People refusing to sign paperwork, DoC and Haz waste notes due to perceived risk of contracting C-19	Parties to keep records of names, dates etc of parties and reasons for lack of signature. Raise issue with EA to alert them to issue	Issue raised with EA by JH
19	24/3	Waste Crime	Disruption to routine collections HWRC result in increase of flytipping	Raise issue with LGA/EA	
20	24/3	Site Issues	Lack of sub contractors who play a key role in keeping sites such as EFWs and other sites with engineering requirements operational	Classify essential contractors as key workers.	24/03/20 Defra confirmed that sub-contractors/third parties which are essential to the continued operations of waste facilities fall under the classification of key workers.
21	24/3	Site Issues	Lack of staff, disruption to business processes or cash flow means that subsistence invoices cannot be paid on time	Alert EA to issue and seek extension to payment deadlines.	
22	24/3	Site Issues	Lack of staff, disruption to business processes or cash flow mean that quarterly waste return, monitoring data and other records required by the EA cannot be submitted on time.	If data cannot be captured and recorded operator to keep a record of why this couldn't be collected. Alert EA to issue.	