

CL:AIRE Definition of Waste Code of Practice (DoW CoP): 2024 Auditing Summary

1. Introduction

CL:AIRE performed a number of DoW CoP audits following the procedures published on its website¹, including Ongoing, Whistleblower and Qualified Person Audits.

This report summarises audit activities conducted by CL:AIRE in 2024 (calendar year). It provides general feedback on how well the industry met the requirements of the DoW CoP, highlights areas of weakness, and recommends potential improvement measures based on the audit findings.

Please note that this report does not include the detailed audit grading (i.e. Good / Improvement Possible / Non-Conformant).

2. Ongoing Audits

The DoW CoP Ongoing Audits procedure was updated in March 2024.

32 projects were randomly selected in line with the published procedures. The selected projects include 15 completed projects with the Verification Report received in 2023, and 17 with an outstanding Verification Report (those which have not submitted their report by the date indicated in the Declaration and have not responded to any reminders).

Audit requests were sent to the project team. 31 (97%) responses were received. The one project that did not reply has been automatically considered non-conformant.

Within the 31 responses received:

- The project teams/developers of two of the selected projects have gone into administration, and no project information could be submitted for audit. Therefore, these two audits were noted as completed under “Into Administration”. These data will not be part of the discussion throughout this Summary Report.
- Another two projects selected for audits were postponed due to the Verification Report status changes.

As a result, full desktop audits were conducted on the remaining 27 projects that responded.

¹<https://claire.co.uk/projects-and-initiatives/dow-cop/28-framework-and-guidance/1593-dow-cop-auditing-procedures>

An external auditor conducted “blind audits²” of two³ projects and the results are presented in Table 1.

Table 1: 2024 External QA/QC of the ongoing audits.

DoW CoP Project	CL:AIRE’s grading	External grading	Key discrepancies
Project 1	Conformant	Non-conformant	* Tracking System * Verification Report
Project 2	Conformant	Non-conformant	

The discrepancies between CL:AIRE’s audit and the external audit are observed in grading the project’s Tracking System and the Verification Report. To highlight the observed poor practice, CL:AIRE decided to align with the external auditor’s opinion and downgrade the project’s final grading.

The breakdown of the number of projects against the project scenarios, the final conformance rate, and the number of CL:AIRE internal QA/QC are summarised in Table 2.

Table 2: 2024 Ongoing audit results⁴ with project scenarios, and CL:AIRE internal QA/QC breakdown.

Scenarios	Number of Projects	Conformance Rate ⁵	Internal QA/QC ⁶
Site of Origin	16	76%	2
Direct Transfer	9	89%	4
Cluster	1	100%	1
Combination of any of the above	1	100%	1

Key insights from the 2024 Ongoing Audits are summarised below:

Positive findings:

- The overall conformance rate is encouraging.
- The project team’s willingness to comply with DoW CoP is high, based on the observations below.
 - A quick response time to audit document requests.

² Blind audits: The external auditor was provided with no notes or observations from the initial audit.

³ This number represents 5% of annual audit works in 2023.

⁴ The result **includes** the grading for the project that did not respond to the audit request and **excludes** the “Into Administration” category.

⁵ Conformance Rate in this report refers to the % of the projects which were graded as either “Good” and “Improvement possible.” To learn more about the CL:AIRE Ongoing Audits grading system, please visit the CL:AIRE website – [Ongoing Audits Procedure](#).

⁶ CL:AIRE Internal QA/QC review is set at 30% of the annual audit number—see the [Ongoing Audits Procedure](#).

- The project team effectively addressed the challenges raised by the auditors and expressed a commitment to improvement measures in the future.
- The quality of Planning-related documentation, including Risk Assessment and Remediation Strategy, is frequently rated as good.

Non-conformant issues related to:

- Failure to reply to the audit request.
- Missing key elements of the Tracking System (DoW CoP main document section 3.2.1) and poor record keeping leading to non-conformant Verification Reports.
- Project being outside the scope of DoW CoP, i.e. reused materials are outside the scope of DoW CoP.

Weaknesses observed in the Materials Management Plan (MMP) documentation portfolio and verification are similar to the previous year’s findings:

- Omission to defer the Verification Report due date or submit the Report to CL:AIRE that led to the Verification Report becoming overdue in the CL:AIRE register.
- Verification Plan and the Tracking System for the material reuse activity are often brief and not in a standalone document.
- Tracking and record keeping:
 - Tracking systems are often brief and do not meet all requirements presented in paragraph 3.12 of the DoW CoP.
 - After the commencement of the work, the designed Tracking System is often not fully applied by the project team, leading to poor record keeping.
- Design Statement includes limited evidence of inspection / acceptance procedures.
- Final Verification Report often:
 - misses the details as to how the material(s) is reused either via the DoW CoP, Exemption, and/or Exclusion.
 - does not link well with the Verification Plan and the reused volume specified in the Declaration(s).

3. Whistleblower Audits

CL:AIRE completed five Whistleblower Audits in 2024. Concerns were raised by either the regulator or a third party. Audit results are summarised in Table 3.

Table 3: 2024 Whistleblower audit results.

Whistleblowers	Number of Projects	Conformance Rate
Regulators ⁷	4	20%
Third Parties	1	

⁷ Regulators includes Local Authority, Environment Agency / Natural Resources Wales.

The following actions were taken by CL:AIRE:

- Warning letters were issued to the project team and / or Qualified Person (when relevant) of the non-conformant projects.
- CL:AIRE temporarily suspended the project Declarations due to regulatory issues raised by the regulators.

DoW CoP users took the following actions:

- Expressed a willingness to comply with the requirements of DoW CoP.
- Engaged with relevant regulators to solve the raised concerns and kept CL:AIRE updated about the outcomes.

4. Qualified Person Audits

CL:AIRE conducted the audit on 17 active Qualified Persons following the procedure published on CL:AIRE's website. Audit results are summarised in Table 4.

Table 4: 2024 Qualified Persons audit results.

Audited Items	Conformance rate Before / After chasing
Qualified Persons Continuing Professional Development (CPD) submission	71% / 100%
Valid Chartership evidence	100% / 100%
2024 Qualified Persons Assessment	94% / 94%
2024 Qualified Persons Professional Report	82% / 94%

The following observations were made:

- Qualified Persons sometimes overlook the CPD upload requirement and miss the deadline to send the evidence.
- CPD logs were found, on occasion, to be over-simplified and focus on only one category of activities, e.g. On-the-job.
- Qualified Persons Professional Report became a new requirement in 2024. One Qualified Person overlooked the deadline for the submission.

5. Recommendations

Following the audits, CL:AIRE has made the following recommendations to DoW CoP users, including project teams and Qualified Persons:

- Adopt a Digital Tracking System to enhance conformance with DoW CoP requirements and improve the quality of the Verification Report.
- Conduct periodic internal audit checks and / or use Interim Verification Reports to keep project records up to date, particularly for long-running and large-size projects.
- Keep the knowledge up to date by regularly checking the CL:AIRE and Qualified Persons eAlerts, [Qualified Persons Handbook](#), [DoW CoP FAQs](#) and [CL:AIRE's LinkedIn](#) page.
- Attend [CL:AIRE training](#) and other events to raise awareness of the DoW CoP and sustainable material reuse.
- Consider [CL:AIRE Insight Service](#) for tailored support during planning large, complex, or phased projects and post-Declaration follow-up to ensure ongoing compliance throughout the project's lifespan.
- Ensure clear and regular communications with CL:AIRE. This can include communications pertaining to the project MMP updates, deferral of Verification Report due date, Verification Reports, and auditing and key contact changes.
- Improve Qualified Persons CPD logs by diversifying the category of CPD activities, e.g. increasing hours logged for formal learning, self-directed study, and contribution to knowledge.