



September 17th, 2020

Notice Of Meeting

You are invited to attend the Neighbourhood Services Committee Meeting to be held on **Tuesday, 22nd September 2020 at 6:00 pm** in **Boardroom Monaghan Row Newry** and via **Microsoft Teams**.

Committee Membership:

- Councillor O Magennis (Chair)
- Councillor T Andrews (Deputy Chair)
- Councillor C Casey
- Councillor W Clarke
- Councillor D Curran
- Councillor A Finnegan
- Councillor G Malone
- Councillor C Mason
- Councillor H McKee
- Councillor K McKevitt
- Councillor D Murphy
- Councillor K Owen
- Councillor H Reilly
- Councillor G Stokes
- Councillor D Taylor

Agenda

- 1.0 Apologies and Chairperson's Remarks.
- 2.0 Declarations of "Conflict of Interest".
- 3.0 Action Sheet of the Neighbourhood Services Committee Meeting held on 19 August 2020. (Attached).

📎 *NS Committee Action Sheet - 19 August 2020.pdf*

Page 1

For Consideration and/or Decision

- 4.0 a) Presentation on the "Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland
- b) Report on draft response on DAERA "Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland. (Attached).

📎 *Report - DAERA discussion document draft response.pdf*

Page 10

- 5.0 Neighbourhood Services Directorate Mid Term Assessment Emergency Business Plan April – September 2020. (Attached)

📎 *NS Emergency Business Plan Review April-June 2020 for NS Committee.pdf*

Page 78

Facilities Management and Maintenance

- 6.0 Memorandum of Understanding of Partnering Arrangement between Dfi Road and NMDDC for Cleaning Busy Town Centre, Footways and Pedestrian area of snow and ice. (Attached).

📎 *Report MoU Dfi and Council re snow and ice.pdf*

Page 84

- 7.0 Report on request to extend Council Christmas displays. (Attached).

📎 *Report on request to extend Council Christmas displays.pdf*

Page 96

- 8.0 Report on Shimna River Wall repairs (Report to follow or verbal update will be provided).

9.0 Report on Phase 3 Reopening of Public Conveniences. (Attached)

 *Report on Reopening of Council Public Conveniences.pdf*

Page 102

10.0 Report on Public Convenience Strategy - 12 week Public Consultation. (Attached)

 *Report Public Conveniences Strategy Consultation Process.pdf*

Page 112

Waste Management

11.0 Report on the annual cost of District Cleansing and Enforcement. (Attached)

 *Report - Annual Cost of District Cleansing Enforcement.pdf*

Page 115

12.0 Report on update of HRC's. (Attached)

 *Report - HRC Reopening Update v3.pdf*

Page 119


For Noting

13.0 Letter from NIEA regarding the Landfill Allowance Scheme (NI) Regulations 2004 (As Amended) 15th scheme year 2019/20 – Draft Reconciliations. (Attached)


 *13Aug20-NIEA Ltr. re NILAS Draft Reconciliation 201920.pdf*

Page 122

14.0 Correspondence received from DAERA regarding Circular Economy Package Policy Statement. (Attached)

 *e-mail from DAERA re Circular Economy Package Policy Statement.pdf*

Page 125

 *CE Policy Statement - A statement issued jointly by the Department for Environment - Exec Summary.pdf*

Page 127

15.0 ARC21 JC Members' Monthly Bulletin of 27 August 2020. (Attached)

 *ARC21 Members Monthly Bulletin August 2020.pdf*

Page 133

16.0 ARC21 JC Meeting Minutes held on Thursday 30 July 2020. (Attached)

 *ARC21 JC Minutes 30 July 2020.pdf*

Page 141

17.0 ARC 21 Consultation Response Plastic Packaging Tax. (Attached).

📎 *Report - arc21 response-Plastic_Packaging_Tax_-_Consultation.pdf*

Page 146

18.0 Historic Action Sheet. (Attached).

📎 *NS Historic Actions Tracker Sheet (updated September 2020).pdf*

Page 166

Exempt Information Items

19.0 Business Case for replacement digger and dumper. (Attached)

This item is deemed to be restricted by virtue of Paragraph 3 of Part 1 of Schedule 6 of the Local Government Act (NI) 2014, information relating to the financial or business affairs of any particular person (including the Council holding that information) and the public, may, by resolution, be excluded during this item of business.

📎 *Report Business Case for replacement digger and dumper and associated plant.pdf*

Not included

ACTION SHEET ARISING FROM NS MEETING HELD ON WEDNESDAY 19 AUGUST 2020

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/178/2020	Monthly Action Sheet	Noted and actions removed as marked.			
		FOR CONSIDERATION AND/OR DECISION			
Ns/170/2020	Notice of Motion – Delivery of small brown food waste bins	<p>Committee agree to the Motion and that Officers undertake necessary research and report back to NS Committee presenting options and costs for consideration and approval.</p> <p>Also that officers look at options both for brown bin caddies and liners and report back to Committee.</p>	J Parkes/J McBride	To be considered at a future Committee Meeting, along with previous Council Motion in relation to distribution of bio-bags/caddy bin liners.	N
		FACILITIES MANAGEMENT AND MAINTENANCE			

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/180/2020	Rewilding and Wildflower areas across the NM&D Council Estate	<p>Note this report and:-</p> <p>Mr Scullion arrange for the relevant officer to contact Councillor Mason regarding proposed site for wildflower area in Drumaness.</p> <p>Mr Scullion arrange for the relevant officer to contact Councillor Clarke regarding the possibility of Island Park Newcastle being included as a wildflower area.</p> <p>A request from Councillor Murphy that further opportunities being offered through Slieve Gullion DEA Meetings to discuss potential wildflower areas in Camlough and Bessbrook.</p> <p>Mr Scullion arrange for the relevant officer to update Councillor Casey on the planting/replacement of cherry trees along the Canal walkway.</p> <p>Important that officials liaise with local people when planning wildflower</p>	K Scullion	<p>In Progress</p> <p>In Progress</p> <p>In Progress</p> <p>In Progress</p>	<p>N</p> <p>N</p> <p>N</p> <p>N</p>

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>areas – e.g Knockchree Avenue Kilkeel where the majority of people seemed content with the current grassed arrangement.</p> <p>The necessity for good horticultural advice in relation to tree management.</p> <p>At the Council meeting held on 07-09-2020 it was agreed on the proposal of Councillor Hanna, seconded by Councillor Doran to remove the plan for rewilding at Knockcree Avenue, Kilkeel until such times as residents have been consulted with.</p>		<p>No further plans proposed currently</p> <p>No further plans proposed currently</p>	<p>Y</p> <p>Y</p>
NS/181/2020	Christmas Illuminations Celebrations Group	<p>Note the contents of this report and the Action Sheet of the Christmas Illuminations Group Meeting held on 28th July 2020.</p> <p>Officers to report back to the Committee in September on the practicalities and costs to undertake proposed extensions to the Christmas</p>	K Scullion	Report to be provided to September NS Committee	Y

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>illuminations displays in Rostrevor, Newcastle and Newtownhamilton.</p> <p>Agree to the replacement of the sustainable Christmas trees in Bessbrook, Dundrum and Crossgar.</p> <p>Endorse other actions detailed in the report of the Christmas Illuminations Group Meeting held on 28th July 2020.</p> <p>Also:-</p> <p>Mr Scullion arrange for the relevant officer to update the Mournes Councillors in relation to the placement of a Christmas tree in Annalong, following the recent Environmental Improvement Scheme.</p> <p>Officers to consider a request from Councillor Clarke that Christmas illuminations be provided in the Newcastle Harbour area.</p>		<p>In progress</p> <p>In progress</p> <p>Complete</p> <p>Report to be provided to September NS Committee</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>
WASTE MANAGEMENT					

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/182/2020	Update on Enforcement Improvement Action Plan	<p>It was agreed to note the above report.</p> <p>Agreed to write, at the earliest opportunity, to the Minister for Department of Agriculture, Environment and Rural Affairs (DAERA), to request the maximum amount payable under a Fixed Penalty Notice in respect of littering and dog fouling offences be increased from the current limit of £80 to £250; and that officers report to Members on the annual cost of District cleansing and enforcement in relation to littering and dog fouling offences, with a view to further proposals which may assist in achieving a 'polluter pays' principle for the District, including but not limited to the possibility of requesting devolving powers for setting Fixed Penalty rates to Councils.</p> <p>Also agreed to write to the other 10 Councils seeking their support for this proposal and asking that they also</p>	J Parkes/J McBride	<p>Report on the annual cost of District Cleansing and Enforcement tabled at Committee, 22 September 2020</p> <p>Letter has been sent to the Minister (DAERA)</p> <p>Letter has been sent out to other 10 Councils</p>	<p>Y</p> <p>Y</p> <p>Y</p>

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>write to the Minister.</p> <p>Agreed to table a report at the September Neighbourhood Services Meeting on the costs of cleansing and enforcement and in relation to dog fouling and littering offences based on the 2019 financial year figures and table a report on the outcome of the benchmarking review with the other 10 Councils.</p>		<p>Awaiting Benchmarking information from other Councils. Update report to be tabled at October NS Committee</p>	N
NS/183/2020	Recovery of the bulky refuse collection service	Note this report and that the service would be kept under constant review and enhanced at the earliest opportunity.	J Parkes/J McBride	Noted	Y
NS/184/2020	DAERA Consultation	<p>Note the above report and agree that Waste Management would start collating a reply on behalf of Council and prepare draft for NS Committee in September.</p> <p>Agreed Officers consider holding a Workshop to brief Members on this document, following on from a NILGA</p>	J Parkes/J McBride	<p>Report tabled at Committee, 22 September 2020</p> <p>Presentation tabled at</p>	Y

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		Workshop which was being held on 27th August 2020.		Committee, 22 September 2020	Y
NS/185/2020	HRCs re-opening plan update	Note the update in relation to the next phase of the re-opening of the Council's Household Recycling Centres (HRCs).	J Parkes/J McBride	Update report tabled at Committee, 22 September 2020	Y
NS/189/2020	Historic Actions Tracking Sheet	<p>Agreed the Historic Actions Tracking Sheet of the Neighbourhood Services Committee Meetings be noted and actions removed as marked.</p> <p>At the request of Councillor Clarke it was agreed Mr Scullion investigate the current position in relation to the access to the beach at Glen River car park, Newcastle and advise him of the outcome.</p>	<p>DSO</p> <p>K Scullion</p>	<p></p> <p>Contractor appointed and works permitted from 15th September</p>	N
IN CLOSED SESSION					
NS/190/2020	Recycling of Mattresses	Agreed to note the content of the report and agree to the recommendations contained at 2.3 and 2.4 of the report in relation to the recycling of mattresses.	J Parkes/J McBride	In progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/191/2020	Business case for use of a suitable fuel supply framework to support the use of a fuel card	Agreed to note the content of the report and approve the business case for the use of a suitable fuel supply framework to support the use of fuel cards across the entire District.	J Parkes/J McBride	In progress	Y
NS/192/2020	Business case for the supply and delivery of biomass wood pellets	Agreed to note the content of the report and associated Business Case and accept the conclusion of the Business Case to proceed to Tender for a Biomass Wood Pellet Supplier for an initial 12-month contract with a view to extending to 24 months.	K Scullion	In progress	N
NS/193/2020	Business case for the annual servicing and maintenance of fire fighting equipment in Council buildings	Agreed to note the content of the report and associated Business Case and accept the conclusion of the Business Case to see the appointment, through a tender process, of a competent contractor to inspect, maintain and testing of all Fire Fighting Equipment in Buildings in the Council's asset register.	K Scullion	In progress	N
NS/194/2020	Neighbourhood Services Procurement Action Plan	Agreed to note that services will continue "out of contract" until new	R Moore	In Progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>contracts are awarded and also to approve the recommended Neighbourhood Services Directorate procurement action plan.</p> <p>Also agreed a quarterly update on the Plan would be provided to Committee.</p>			
NS/195/2020	Residual Waste Treatment Project (The Project) Briefing Paper on NoArc21 Queries	Agreed to note the briefing paper on Residual Waste Treatment Project ("the Project") on NOARC21 Queries and that the Paper be circulated to all Councillors for their information.	R Moore	Circulated to all Councillors on 25 August 2020	Y

Report to:	Neighbourhood Service Committee
Date of Meeting:	22 nd September 2020
Subject:	DAERA – Draft response on Future Recycling and Separation of Waste of a Household Nature in Northern Ireland
Reporting Officer (Including Job Title):	Roland Moore, Director: Neighbourhood Services
Contact Officer (Including Job Title):	Joe Parkes, Assistant Director: Waste Management

Confirm how this Report should be treated by placing an x in either:-

For decision	<input type="checkbox"/>	For noting only	<input checked="" type="checkbox"/>
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1.0	Purpose and Background
1.1	<p>As previously reported in August 2020, The Department of Agriculture, Environment & Rural Affairs (DAERA) is seeking views on a public discussion document on the "Future Recycling and Separation of Waste of a Household Nature in Northern Ireland".</p> <p>The document sets out the current position of recycling in Northern Ireland, and the current and new regulatory, climate change and market drivers that will influence policy in the future. It seeks views on a range of proposals, which will help shape the landscape of waste management in Northern Ireland.</p> <p>The closing date for submissions is the 4th October 2020.</p> <p>The key proposals of the public discussion document have been highlighted to the Committee in the preceding presentation.</p>
2.0	Key issues
2.1	<p>This year will see the introduction of a range of new requirements relating to the management of waste as part of the Circular Economy Package. This includes requirements around recycling and the separate collection of waste. In particular, businesses who produce mixed waste and waste which is similar in nature and composition to waste from households will be required to present their waste for recycling.</p> <p>As with households, businesses will be required to facilitate the separate collection of the main household waste streams such as paper, metal, plastic and glass. These measures do not extend to waste resulting from production.</p>
2.2	<p>This discussion document will not introduce any new policies, but rather seek views on steps towards improving the quality and quantity of household and non-household recycle in Northern Ireland and cut landfill rates whilst having minimal impact on businesses and householders.</p>

	It seeks views on a series of proposals for what our recycling environment could look like in the future and makes suggestions on possible ways to improve the quality and quantity of municipal waste recycled in Northern Ireland.
2.3	Whilst the Department has emphasised that this document is for discussion only and does not introduce any new policies at this stage, there are some firm 'proposals' set out. It is therefore important that the Council and Local Government sector generally places on record its responses to these issues and proposals.
2.4	<p>The following summarise the nature and scope of the consultation:</p> <ul style="list-style-type: none"> • Section 1: Current position of recycling in NI, current & new regulatory, climate change and market drivers • Section 2 Outlines the purpose of the discussion; to seek views from stakeholders on steps towards improving the quality and quantity of household & non-household recycle in NI, improve reductions in food waste, cut landfill rates and to get businesses on board; outlines 17 proposals to achieve this. • Sections 3 & 4 describe the strategic context and policy rational for the discussion. • Section 5 sets out proposals and associated questions on improving recycling from businesses. • Section 6 sets out proposals and associated questions on improving recycling from households.
2.5	<p>Attached at Appendix 1 is a draft response to the discussion document issued by DAERA. Several of the issues/proposals raised are of particular significance for the Council, and if implemented are liable to have substantial impacts upon the financial burden of delivering our waste management services.</p> <p>As part of the consultation, forty-nine (49) questions have been asked across seventeen (17) key proposals.</p>
3.0	Recommendations
3.1	It is recommended that Council approves the submission of the attached response to DAERA's discussion document.
4.0	Resource implications
4.1	It is not envisaged any additional resources will be required as part of replying to the DAERA discussion document.
4.2	The outcome of the DAERA discussion document, if going by the present steer, could have a major impact on resource requirements. The Council could find itself having to make major changes to its waste/recycling collection service.
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)

5.1	<p><i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i></p> <p>It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations <input checked="" type="checkbox"/></p>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision.</i></p> <p>Not at present, but likely at a later date.</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened <input type="checkbox"/></p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation <input type="checkbox"/></p>
5.3	<p><i>Proposal initiating consultation</i></p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves <input type="checkbox"/></p> <p>Consultation period will be 12 weeks <input type="checkbox"/></p> <p>Consultation period will be less than 12 weeks (rationale to be provided) <input type="checkbox"/></p> <p><i>Rationale:</i></p>
6.0	<p>Due regard to Rural Needs (please tick all that apply)</p>
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment completed <input type="checkbox"/></p>

7.0	Appendices
7.1	Appendix One – Draft response to discussion document Appendix Two – Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland – Public Discussion Document.
8.0	Background Documents https://www.daera-ni.gov.uk/consultations/discussion-future-recycling-and-separate-collection-waste-household-nature-northern-ireland
8.1	Municipal Recycling Potential in Northern Ireland 2020 (WRAP Report)
8.2	Previous August NS Committee Reports relating to the above subject.

APPENDIX ONE

Newry, Mourne and Down District Council's response to DAERA Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland Consultation Questions

Proposal 1: Improve the capture of food waste from businesses

Since April 2017, the Food Waste Regulations (Northern Ireland) 2015 require that any food business that produces 5kg or more of food waste per week to segregate and secure the separate collection of food waste. Premises where food is brought from elsewhere to be consumed, such as an office where members bring their own food to consume during breaks, are not defined as food businesses. Fines for not complying with the legislation range from fixed-penalty notices of £300 to fines of £10,000 for repeated non-compliance. Since the statutory duty was introduced, in tandem with mandatory household food waste collection, there has been a 5% increase in recycling rates, mainly attributed to the food waste regulations.

A recent survey of Non-household Municipal sector (NHM) businesses and facilities in Northern Ireland undertaken by WRAP showed that 43% of food businesses did not have separate food waste collection. Overall, for the NHM sectors only 25% had separate food waste collection. Modelling on food waste production from the NHM sectors estimates that most businesses would be producing more than 5kg of food waste per week. This indicates that many businesses in these sectors are not complying with the food waste regulations. There may be a number of reasons for this lower than expected compliance with the regulations, including lack of awareness of requirements, constraints on the amount of monitoring and enforcement undertaken, difficulty in measuring the 5kg threshold and additional cost of the service or accessibility to service providers.

Proposal 1: In order to increase food waste collected from the non-household municipal sector, the Food Waste Regulations (Northern Ireland) 2015 should be reviewed to ensure obligated businesses segregate food waste for collection

Q1. Do you agree or disagree that that the Food Waste Regulations (Northern Ireland) 2015 should be reviewed regarding food waste collections from food businesses?

Agree -The Food Waste Regulations (NI) 2015 should be reviewed to ensure obligated businesses segregate food waste for collection with the aim to increase food waste collected from non-household municipal waste. Logistical arrangements for this increased collection of food waste should also be considered in the context of carbon emissions.

Q2. If the Food Waste Regulations were to be reviewed which of the following areas should be investigated:

	Strongly Agree	Agree	Disagree	Strongly Disagree	Not sure/ Don't know
Awareness of the Regulations to obligated businesses	X				
Requirements to separate food from all business types			X		
Options to amending the regulations for more business types to be in scope of the requirements		X			
Access to food recycling services for businesses		X			
Charging levels for food waste collection services	X				
Monitoring of business compliance		X			
Enforcement of business compliance		X			
Data and reporting of food recycling		X			

The quantity of 5kg should be critical in regard to those obligated and those not required to separate. The enforcement, education and monitoring of any future changes will also be key for all businesses that are obligated.

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Proposal 2: Require businesses to separate their dry recyclable waste

We propose to require all non-domestic businesses, public bodies and other organisations generating municipal waste to have to segregate the four recyclable waste streams glass, paper and card, metal and plastics from residual waste in order for it to be collected and recycled appropriately. Further review of the circumstances in which it may not be technically or economically practicable to collect it separately, or in which separate collection may not have significant environmental benefit will be undertaken by government. These proposals are in addition to the existing requirement for food businesses producing 5kg or more of food waste to separate it for recycling. We have proposed two potential scenarios which are outlined below.

Option 1: Separate Dry Recycling and Separate Food Waste.

This option would require all businesses and public-sector organisations to segregate dry mixed recycling (except glass) and to adopt separate food waste collection. In this scenario, eligible businesses and organisations would collect 5 key dry materials – paper, card, plastic bottles, plastic pots, tubs and trays, and metal. Glass would remain in the residual stream, unless optional additional arrangements were made. Businesses would also present food waste separately for collection. We estimate this could deliver a 70% recycling rate for the non-household municipal sector.

Option 2: Separate Dry Recycling, Separate Glass and Separate Food Waste.

Under this option, all businesses and organisations will be required to separate dry material, food waste and glass for collection. This option would deliver a 74% recycling rate across the non-household municipal sector.

It might be appropriate to exempt some firms from provisions, similar to current exemptions for food waste, and these circumstances are considered below. This might be most appropriate for micro firms where the costs of compliance might be higher.

We would expect businesses to be able to at least segregate recyclable waste from residual waste in all circumstances so that it can be collected and recycled.

We would be interested in views on where this may not be practicable for example for technical, environmental or economic reasons.

Proposal 2: We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.

Q3. Do you agree or disagree that all businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

Agree – This is essential and should have an immediate economic benefit for businesses notwithstanding the need to move towards a circular economy.

Q4. Which of the two options do you favour?

Option 1: mixed dry recycling and separate food recycling; no glass recycling	
Option 2: mixed dry recycling, separate food recycling and separate glass recycling	
Something else (please explain below)	X
Not sure/no opinion	

Please explain your selection:

As long as the waste is recycled with relevant quality standards and outcomes met, then the mechanics of the service could vary i.e. comingled MDR with glass.

Q5. We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on a preferred position for instances where this may not be practicable for technical, environmental or economic reasons

Yes

Q6. Should some businesses, public sector premises or other organisations be exempt from the requirement?

No

Q7. Do you have any other comments to make about Proposal 2? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

Practical solutions will need to be developed with the business sector to assist with the need to increase recycling such as communications, infrastructure, education, servicing and logistics, etc.

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Proposal 3: Review the impact on rural businesses

The default definition of “rural” used in Northern Ireland is those settlements with populations of less than 5,000 together in the open countryside as rural. Around 670,000 people in Northern Ireland live in a rural area representing approximately 37% of the population. Most strategies and policies developed and implemented across government have a rural dimension and it is recognised that they can have a different impact in rural areas than urban areas due to issues relating to, for example, geographical isolation and lower population densities. It is recognised that as a result of rural circumstances people in rural areas may have different needs and therefore a policy or public service that works well in urban areas may not be as effective in rural areas. The Rural Needs Act (Northern Ireland) 2016 (‘the Act’) introduced a new duty on public authorities in Northern Ireland to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services.

Proposal 3: As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.

Q8. Considering rural needs, what factors should be included in the review of the proposals on non-household municipal waste:

	Yes	No	Not sure/Don't know
Cost of recycling services proposed compared to collections in urban areas	X		
Ability to reconfigure services to alleviate cost burden in rural addresses	X		
Access to recycling services in rural areas	X		
Issues with communicating to rural businesses			X

Q9. Please list any other specific factors that should be included in the assessment of the policy proposals that may have a different impact on businesses in rural settlements.

Proposal 4: Review options to alleviate any cost burden on businesses

Increasing recycling would be expected to save businesses money especially in situations where the majority of waste is being disposed as residual waste. However, the extent of savings and financial impact often depends on what services are already in place and the business size or amount of waste generated. Research has suggested that for small and micro sized businesses there may potentially be a cost increase in achieving the highest quality recycling systems based on the current range of services and offered in Northern Ireland. At this stage, government is keen to hear initial preferences for options that have the impact of maximising recycling of waste without financially burdening businesses.

If the proposals above are adopted, we would like to support businesses, the public sector and other organisations to make the transition successful. In particular, we would like to find ways to reduce the impact on small and micro businesses. There are a number of measures available that could be used to minimise the costs of waste collection and recycling. The options outlined below have been suggested by Northern Ireland business representatives. We will assess the feasibility and costs of a reduced list of these options over the period of this consultation and beyond.

Proposal 4: We propose to review options to maximise business recycling whilst alleviating cost burden on businesses

Q10. We would welcome views on these options and also evidence of other measures that may be available to support business recycling and to reduce costs for businesses.

Likelihood of increasing recycling without a cost burden to businesses	Very Likely	Likely	Unlikely	Very Unlikely	Not sure/Don't know
Improving access to drop off sites and HWRCs for business use.					X
More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.		X			

Providing business advice on optimising/ rationalising current services.		X			
Sharing of containers with neighbouring businesses.		X			
Regional procurement of services to enable economies of scale and reduce charges levied on businesses.		X			
One to one support and advice for businesses.	X				
Clearer information on what materials can be recycled and how.	X				
On-line tools and calculators to provide information on reducing costs.	X				
Better data to help businesses measure performance and benchmark.					X
Standardisation in pricing approaches from private contractors.					X
Combining door to door household and business collections.		X			
Better access and availability of kerbside services.		X			
Rewards for businesses that recycle such as incentives, ratings and reduced costs.		X			
Government or Industry subsidised cheaper costs of collection services.	X				
Reviewing cross boundary working options (both local authority and national level).					X
Clarity in where and how waste and recyclables are treated.					X

Other: N/A

Q11. What are your general views on the options proposed to reduced costs?

The requirement for businesses to recycle should not result in additional costs for local authorities, however, where local authorities can support at no additional costs then this should happen. Additional costs should they materialise, should be borne by the businesses and/or central government.

There is an opportunity for 11 Councils to develop a consistent approach to what services could be offered to other sectors focusing on similar service propositions.

Q12. What might be other viable options to reduce the cost burden that we have not considered?

There is an opportunity for 11 Councils to develop a consistent approach to what services could be offered to other sectors focusing on similar service propositions.

Q.13. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

No.

Proposal 5: Improve data reporting from businesses

Having good data on business waste is essential to be able to understand the impacts of waste flows in the environment and to design support for a wide range of organisations in scope of the proposals. Currently businesses are not legally obligated to report their waste tonnages in the same way as Councils report on household waste. There is a gap in comprehensive data on the flow of waste from businesses and other organisations, limited information on container provision and on the service profiles adopted. If we want to achieve higher recycling rates for municipal waste we will need to improve the quality of data and information available on the current baseline of services in order to determine the scale and cost of making improvements.

Government does already require waste facilities to report flows and types of waste and recycling managed at their sites. However, the nature of collecting mixed loads of waste in rounds means that it is not straightforward to estimate amounts originating from specific businesses or individual sectors. Government has commissioned surveys, but they are often expensive and not wholly reliable or representative of the diverse sectors generating waste and so have not been repeated recently. As a result, our estimates of business and public-sector waste rely on incomplete, fragmented data and a number of assumptions, which impacts on its robustness. This issue must be addressed if we are to assess our progress towards a 65% recycling rate target for municipal waste and develop support mechanisms which alleviate the costs on businesses.

We want to work with waste producers and waste collectors in this sector to develop more reliable reporting systems for waste and will look at whether we can implement harmonised waste reporting systems that can be used by Councils, businesses and public-sector organisations. For example, we are currently undertaking proof of concept work on waste tracking which, if successful, will help us to obtain more transparent, timely, robust and cost-effective waste management data.

We are not consulting on specific proposals for reporting here but will develop proposals with the sector and develop a future consultation on detailed measures to implement consistency.

Proposal 5: In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to further consultation.

Q14. Should businesses and other organisations be required to report data on their waste recycling performance?

Yes

Q15. Who should bear the responsibility for reporting data on waste from businesses and other organisations (please select all that apply)?

- Producers (businesses and other organisations where waste is produced).
- Collectors (the organisations responsible for the collection of waste from businesses and other organisations).

Q16. What specific data sets would your organisation find useful if businesses were required to report under Proposal 5?

A simplified version of current data sets as reported for local authority collected waste.

Proposal 6: Councils should restrict capacity for residual waste from households

As food waste and dry recycling collections increase, we expect the amount of residual waste collected to reduce. Since 2006, residual waste has fallen by 56%, from approximately 205,000 tonnes to 115,000 tonnes. These reductions in the level of residual waste have led Councils to review the frequency of residual collections and reduce them to fortnightly whilst refocussing efforts in improving recycling services.

Trends show that in recent years local authorities across the UK have considerably increased restrictions to the available capacity of residual waste for households. These residual waste restrictions have been achieved typically through lower frequency collections or by reducing the volume of residual containers for households. Research shows higher levels of recycling performance are associated with restricted capacity for residual waste. It is understood that Councils have made the restrictions in residual waste in order to deliver financial savings to the local council, to increase recycling performance and the capture of key materials, to help with the introduction of new recycling services or a combination of these reasons. Consumer feedback shows that satisfaction in waste and recycling services is dependent on the comprehensive profile of services offered and that despite reductions in residual capacity public support can remain very high.

Most Councils restricting residual waste capacity have tended to reduce frequency of the service since this offers greater financial savings than replacing the container and maintaining the frequency. In restricting the capacity of the residual stream Councils have sometimes made enhancements to the recycling collections at the same time. Enhancements to recycling collections could be made by either increasing the range of materials collected, increasing the frequency of the recycling collections, or increasing the available recycling container capacity.

The restrictions to residual waste tend to be placed on kerbside door to door collections rather than to flats or high-density housing. Exemptions for high density or other difficult to service properties would need to be considered in any policy on restrictions of residual capacity.

The survey questions are looking at interest in the principles of residual restriction rather than the precise service specification at this stage. Further dialogue on the detail of the type of residual restriction, the accompanying recycling service profiles and the expected service standards for delivery will be included in a further consultation which would take place in 2021.

Proposal 6: We propose that all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.

Q17. Do you agree or disagree with the proposal that Councils should be required to restrict residual waste capacity (either by frequency or by residual container volume)?

Agree – Councils should in principle, be required to restrict residual waste capacity as this is clearly in alignment with the waste hierarchy.

Q18. Assuming there will be necessary exemptions for key property types, do you have any preference with the proposals below that Councils should be required to restrict the residual waste in different ways?

(Note that Q17 looks at possible enhancements that could be made to possible restrictions of residual waste)

Not sure/don't have an opinion

Whilst any of the options detailed above would restrict residual waste, the key should be consistency on an NI wide basis with the aim of one residual waste collection model for 11 Councils, which would increase public behaviour change and acceptability.

Q19. If residual restriction was to be implemented, which enhancements should be made to the recycling service to help increase performance and ensure consumers are satisfied with the overall services offered?

Potential Enhancement	Yes	No
Increased frequency of the dry recyclables collection		
Increased frequency of the food recycling collection		
Larger container capacity for the dry recyclables collection		
A higher frequency sanitary waste collection		
A collection of nappies for young families		
Other (please specify) - X		
Not sure/don't have an opinion		

This requires further consideration in respect of the waste hierarchy. Our first priority should be to reduce waste. The economic and carbon emissions for each and all of the considered options (and others) need assessed in detail prior to considering what (if any) enhancements should be implemented.

There are suggestions that a larger MDR collection may assist with public acceptability but given the wider environmental changes such as EPR and DRS, will this additional capacity be the required?

Proposal 7: Councils to provide all households with a weekly food waste service

Approximately 285,000 tonnes of household food waste (that is incorrectly placed in residual waste bins) is sent to landfill in Northern Ireland each year. Here it can release methane, a harmful greenhouse gas, into the atmosphere unless captured for energy generation. If collected separately from residual waste materials, food waste can be sent for in-vessel composting (IVC) or anaerobic digestion (AD), where it breaks down in a controlled way and the methane from AD is converted into gas that can be fed into the national gas grid, used to generate electricity, or used as a vehicle fuel. The AD process also produces a nutrient-rich fertiliser (called digestate) that farmers can use in place of chemical fertilisers.

Currently, all Councils in Northern Ireland offer a collection of food waste separately from residual waste. Out of this, 19% of households receive separate food waste collection on a weekly basis and 81% of households receive collection of food waste mixed with garden waste, usually on a fortnightly basis. UK research shows that collecting food waste mixed with garden waste fortnightly can lead to lower yields compared to a weekly separate food waste collection. On the other hand, mixed food and garden waste collections can be easier to implement as it does not require separate arrangements for collection of food and garden waste. Some UK Local Authorities do provide weekly mixed garden and food collections but to keep costs low many collections tend to be fortnightly.

In order to maximise capture of food waste we propose to require that from 2023, all Councils offer all households a weekly food waste collection. This would be expected in all circumstances except where it was not technically, environmentally or economically practicable to collect this waste separately from other bio-waste. Although there may be some circumstances where a mixed food and garden waste collection is necessary, these should be limited. This might include for lower transport costs arising from using local IVC facilities.

Proposal 7: By 2023 we propose to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.

The following question is designed to consider preferences for the proposal and consultees are encouraged to select more than one option where they may be interested in multiple aspects of the proposal.

Q20. Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste		X	
(ii) a separate collection of food waste (i.e. not mixed with garden waste)		X	
(iii) a weekly mixed food and garden waste collection		X	
(iv) services to be changed only as and when contracts allow			X
(v) providing free caddy liners to householders for food waste collections	X		

Councils in NI have been operating Co-mingled food and garden waste collections for a number of years, which appears to be performing satisfactorily. With capacity and systems currently able to deal with the food waste generated, we do not believe that an additional separate weekly collection of food waste will yield significant returns needed to offset the economic commitment and carbon emissions it would take to capture any additional food waste (should this materialise).

Proposal 8: Councils to collect a core set of dry recyclable materials from all households

We think the time is right to put in place changes that will ensure the same range of materials is collected for recycling from kerbside for every household in Northern Ireland to help avoid any confusion for households. We therefore propose to legislate for all Councils in Northern Ireland to be required to collect a minimum or core set of 'dry' recyclable materials from kerbside households and flats. This will ensure that every householder is able to recycle a consistent set of materials. We think it is unlikely that Councils will need to deviate from collecting these materials but would welcome views on circumstances where this might be necessary.

Proposal 8: We propose that all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

This core set of dry materials should include at least the following:

- glass bottles and containers – including drinks bottles, condiment bottles, jars etc.
- paper and card – including newspaper, cardboard packaging, writing paper etc.
- plastic bottles – including drinks containers, detergent, shampoo and cleaning products etc.
- plastic pots tubs and trays

Q21. Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that Councils should be required to collect a set of core materials for recycling?

Agree: Councils should be required, to collect a core set of materials.

Q22. We think it should be possible for all Councils to collect the core set of materials. Do you agree with this?

Agree: This will be possible provided the Councils have the flexibility to determine optimum collection arrangements.

Q23. What special considerations or challenges might Councils face in implementing this requirement for existing flats and Houses in Multiple Occupancy (HMOs)?

Storage and security for receptacles will be an issue in some locations, which could lead to abuse/contamination.

Q24. Do you have any other comments to make about Proposal 8? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

Our Council already successfully collects these materials from all householders in the District. As long as Councils have flexibility over collection methods then this will still be practical and economic.

DRAFT

Proposal 9: The defined core set of materials for household collections

Consolidating the range of materials collected will help build a platform for additional materials to be added to a core list and provide greater clarity for funding going forwards. The waste streams generated by households contain some items or materials that could be considered 'difficult to recycle' using conventional sorting and reprocessing infrastructure in Northern Ireland and across the UK. These items include a wide range of products including plastic films, non-bottle glass, sanitary products and composite packaging. Over time, the composition of waste from households is expected to change under the influence of Extended Producer Responsibility (EPR) on packaging design and industry initiatives and this may consequently have an impact on collection systems.

As a consequence, the core set of materials specified by government may need to adapt to these changing circumstances, as products are re-designed and manufacturing processes develop to reprocess these materials. Therefore, we will maintain flexibility within the law to update the core set of materials to be collected, if required, in the future.

New materials would be added to the core set, subject to further consultation and evidence being provided that they are collected or can reasonably be collected for recycling and can reasonably be recycled. The range of materials would also be determined by packaging EPR and Deposit Return Scheme (DRS) proposals (as outlined above). It is expected that the additions to the core set would be considered with the UK countries to ensure greater clarity for consumers and also to help develop UK reprocessing facilities.

Other materials that could be included either immediately or over time might be:

- plastic bags and other plastic film and;
- black plastic food and drink packaging.

Some Councils have expressed concern over the economic viability of collecting all recyclable materials because of a lack of market demand or low prices offered by re-processors for materials.

This is a valid concern, but it is expected that the materials added to the list will be in scope of reforms to producer responsibility which will ensure full net cost recovery overall for packaging materials and so costs of collection would be covered. The greater consistency in collections will help to support more sustainable secondary materials markets and better-quality recycling.

We would welcome views on whether the proposed core set of dry materials identified above is sufficient and whether it could include other materials which might be regarded as more difficult-to-recycle. We also welcome views on circumstances where such a comprehensive service for dry recycling may not be practicable from a logistical perspective and challenges for the householder.

We are also aware of a growing trend of businesses and public bodies switching from using plastics to certified compostable plastic packaging and tableware. Compostable plastics are also being used to manufacture packaging of short-life products and container lids.

Where compostable plastics are collected in dry recycling collections they may contaminate the dry recycling process and compromise quality. Clear labelling and communications would be necessary to help manage these risks. Appropriate treatment infrastructure would also need to be in place before we considered adding compostable plastics to the core list of materials to be collected for recycling.

Proposal 9: We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q25. Do you believe that all of these core materials should be included or any excluded?

Material	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	X		
Paper and card	X		
Plastic bottles	X		
Plastic pots tubs and trays	X		
Steel and aluminium tins and cans	X		

Q26. What other products or materials do you believe should be included in the core set that all Councils will be required to collect?

Material	This should be included in the core set from the start	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Plastic bags and film	X			
Black plastic food and drink packaging	X			
Other materials (please specify)	X			

Subject to processing capabilities at MRFs, household batteries, textiles, small WEEE.

Q27. If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Government Policy to allow local authorities, processors and producers to have a collegiate approach to developing a truly holistic circular economy.

Q28. Do you have any other comments to make about Proposal 9?

As with many of the points raised previously, the economic and carbon analysis needs to be undertaken and where additional costs are anticipated, central government needs to support local government financially.

Proposal 10: Review the set of core materials regularly and expand over time provided that conditions are met

Proposal 10: We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that:

- a) evidence supports the benefits
- b) there are viable processing technologies for proposed materials
- c) there are sustainable end markets
- d) Councils would not be adversely affected, including financially.

Q29. Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

Yes.

Q30. Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

Yes.

That the materials have processing technologies and sustainable end markets, preferably locally to support the proximity principle and develop circular economy in NI/Ireland/GB.

Q31. Do you have any other comments to make about Proposal 10?

The need to continually review should include all stakeholders including producers, processors, central and local government and should be ambitious to extract maximum circular economy opportunities.

Proposal 11: Review the separate collection requirements for Councils and provide supporting guidance

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality of valuable resources collected for reprocessing. Research shows that greater separation of materials does increase the likelihood of these resources being utilised in closed loop recycling processes which significantly increases the overall environmental benefits gained (see Encirc case study in the main discussion document).

It is also likely that producers paying into Extended Producer Responsibility (EPR) with their own incentives of packaging targets will want to ensure that resources they are accountable for are recycled into optimum end-markets in the UK.

Regulations 18 and 20 of the Waste Regulations (Northern Ireland) 2011 transposed the Waste Framework Directive requirements for ensuring separate collections of paper and cardboard, plastic, metal and glass. The Regulations encourage separate collections of dry recyclables but allow for deviations in approach and service delivery and mixing of materials on the basis that locally it may technically, economically and environmentally practicable (TEEP) to do so. Current UK Guidance from the Regulator and key stakeholders provides advice on the application of the regulations.

Typically, separate collection should take place except where: collecting certain types of material together does not affect their potential to undergo re-use, recycling or recovery operations and results in output from those operations which is of comparable quality to that from separate collection;

- separate collection does not deliver the best environmental outcome;
- separate collection is not technically feasible taking into account good practice in waste collection;

- separate collection would entail disproportionate cost, taking into account costs of adverse environmental and health impacts of mixed waste collection and treatment, as well as potential for efficiencies from separate collection and revenues from secondary material sales and polluter pays principles.

Since the available UK guidance is now a few years old and with recent and potential forthcoming changes it is important to clarify the requirements of separate collection in law to make these clearer for Councils and waste operators to follow.

Collecting a broader range of materials may alter the approach under which collection systems could be considered more or less efficient. The revisions to the Waste Framework Directive under the Circular Economy Package (CEP) and the proposals for a core set of materials with potential expansions means that it is now time to review the supporting guidance.

Subject to views from this consultation we will prepare guidance setting out further advice on separate collection and seek to clarify the law as necessary.

Proposal 11: We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections to help Councils and waste operators in decision making on separate collection.

Q32. Do you agree that a review of separate collection requirements is required for Northern Ireland to inform municipal collections in light of proposals for core sets of recyclable materials and new producer obligations under Extended Producer Responsibility (EPR)?

Not sure/no opinion/not applicable

This needs analysis to determine if there is a marked difference in the outcomes or comingled systems versus separate collections and must take into account conditions local to NI opposed to transposed from other jurisdictions. Whilst consistency will no doubt bring benefits to all householders, any such change must be considered through robust evaluation on the operational, economic, and carbon emission that would emanate from future system choice. Any additional revenue and capital obligations for local government must be supported by central government over and practical timeframe, notwithstanding EPR/DRS impacts.

Q33. What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide supporting evidence for your statements.

- Financial impact of system change on Councils
- Carbon emissions of systems (comingled v separate collection)
- Technology/Capacity improvements at MRFs to process comingled
- Public acceptability/preference for co-mingled collection
- Rural issues
- Impact of EPR/DRS

Proposal 12: Provide national guidance for NI on greater consistency in services for households

We want to increase the quantity of materials collected for recycling, but we do not wish to do so at the expense of quality. We want to help Councils improve the quality of what is collected for recycling so that its value can also increase. We also want Councils to make the best decision for local circumstances. However, we recognise that since Extended Producer Responsibility (EPR) is likely to be adopted across the UK there is a need to encourage some convergence in scheme profiles to benefit producers who would be expected to financially support service delivery going forwards.

National guidance would help waste collectors to meet their duties in relation to separate collection and promote high quality recycling. Guidance could also set out the process by which Councils should use the conditions above to support decisions on local collection arrangements and what information should be recorded in relation to any assessment of separate collection.

Over the past decade each of the nations has made steps to promote commonality in collection systems within their own country. Whilst there have been common aims the extent to which each country requires adherence to the specific service profile or retain flexibility does vary. The main discussion document outlines the key approaches the nations have taken.

The detail of service specifications will be considered in a follow up consultation. At this stage we are seeking views on the type of guidance that should be put in place in order to encourage the level of change desired. This national guidance could come in one of three forms of detail and specification from Government:

1. Statutory Recycling Service Guidance:

This option would develop statutory guidance for specifically how recycling services must be provided to residents, that all Councils are required to follow.

2. Statutory Guidance Setting Minimum Standards for Recycling Services:

This option would provide Statutory Guidance on a minimum level of service beyond which Councils will be able to design and deliver services locally for their area.

3. **Non-Statutory Guidance for Recycling Services:** This option would provide good practice Guidance on service standards and local flexibility in service design but with no requirement to meet these standards.

Proposal 12: Based on the preceding summary of the key issues, we therefore propose to provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.

Q34. What would be your preferred approach to Government encouraging greater national consistency in collection services?

Proposal	Agree	Disagree	Not sure/don't have an opinion/not applicable
Publish Statutory recycling service guidance to detail service requirements?		X	
Publish Statutory minimum service standards guidance?			X
Publish non-statutory guidance?			X

Q35. Do you have any further comments to make about the Proposal outlined above?

Councils need to be able to undertake their own local decisions on operations which suit them. As long as Councils are meeting high-level outcomes, so this guidance needs to focus on the "what" opposed to the "how" for local authorities.

Option 1 appears that this will be too prescriptive, option 2 may be applicable but would need to see the detail to determine how much flexibility will be afforded to local authorities. Option 3 would be similar to the status quo.

The previous comment in relation to residual waste collections and preferred consistency would be contrary to this.

Proposal 13: Support national campaigns to communicate effectively on recycling

Despite improvements in recycling performance there is a considerable amount of recyclable material and organic material which is disposed of in residual waste receptacles. According to WRAP's 2018/19 Recycling Tracker Survey, 64% of households in Northern Ireland disposed materials into the residual bins that could have been recycled.

While changing people's behaviour can be challenging, many householders want to recycle. For example, in WRAP's 2018/19 Recycling Tracker Survey, 55% of householders in Northern Ireland said, 'I want to be a really good recycler and I take the trouble to ensure that I'm doing everything right'. Therefore, we should make it easier for them to participate by providing clear information. Effective and sustained communications with householders will be critical for ensuring that we achieve our main objectives of increased recycling quantity and quality, and will help to:

- minimise public confusion over what can and cannot be recycled and help increase participation in recycling schemes and minimise contamination;
- give the public suitable information on how and where their waste is recycled. Lack of transparency and understanding over whether their waste is actually recycled can often dent public confidence in recycling schemes;
- help deter public misuse of collection bins and other poor behaviours, e.g. fly-tipping, vandalism;
- build a culture of sustainable waste management underpinned by appropriate waste separation for recycling among householders and businesses; and;
- clarify the responsibilities that Councils would have for undertaking separate waste collections from households.

Proposal 13: We will continue the support by the Department for Recycle Now and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.

Q36. Do you have any comments to make about Proposal 13?

Agreed as continual communications and education is key. Ongoing financial support for Councils should also be considered in this regard.

Q37. What information do householders and members of the public need to help them recycle better?

- The importance for the waste hierarchy, reduce, reuse, before recycle.
- Practical answers to questions on what can be recycled and where.
- Contamination and how to avoid
- Financial and environmental benefits
- How they can play their part in shaping a circular economy

Proposal 14: Improve transparency of information on the end destination of recyclables

Householders are not always clear on the benefits of recycling and what happens to materials following collection. For example, some people believe that materials are landfilled or incinerated rather than properly recycled or are sent overseas to be landfilled rather than recycled.

We want to ensure that householders have a clearer understanding of where the waste they sort for recycling goes to and what the final outcome is, and that they are confident that what they do is helping to reduce waste and preserve environmental health. Changes within the data system Councils use to record waste information (Waste Data Flow 44) have provided the facility to improve the transparency of details on waste treatment for different materials, and wider publicity of end destination might help to support public confidence in recycling.

Current reporting on contamination from Materials Recovery Facilities (MRFs) in Northern Ireland is inconsistent. One of the difficulties comes from the need to report contamination by Councils, which can be problematic as material can be sent to multiple MRFs. The information on contamination is recorded by MRFs, but there is no requirement to report these figures. Accurate reporting on contamination can have a big influence on assessing the benefits of different recycling schemes and in the future could influence funding delegation from Extended Producer Responsibility (EPR).

Government is currently undertaking proof of concept work through the GovTech Challenge to test the feasibility of developing a means of more effectively tracking waste from production, through treatment and final destination, including waste exports. This has potential to provide a more transparent stream of information to the public and industry about recycling and materials flows. If successfully implemented, this may help to increase public and stakeholder confidence in the benefits of recycling.

Consistent collections will make it more efficient and cost-effective to communicate with the public, irrespective of where they live and work in the country. They will also help to improve the labelling of materials for recycling purposes.

Proposal 14: We will work with Councils and others to improve transparency of information available to householders on the end destination for household recycling.

Q38. Do you agree or disagree with this proposal?

Agree – government should work with Councils and other stakeholders on this.

Q39. Do you have any other comments to make about Proposal 14?

The information provided should be purely to assist and encourage householders in a simple way to comply with the waste hierarchy. This should be done without placing an additional administrative burden on stakeholders.

Proposal 15: Introduce regulation which requires Materials Recovery Facilities (MRFs) to report the detail of input and output materials

Codes of Practice with statutory reporting requirements on the weight of target, non-target & non-recyclable materials currently exist in Materials Recovery Facilities (MRFs) in England, Wales and Scotland, but not Northern Ireland. Such reporting is also in line with circular economy reporting requirements for municipal waste. Introducing these codes of practice to Northern Ireland can assist in assessing performance and identifying opportunities for individual MRF and increase transparency for residents as to the destination of their recycling that is collected.

Proposal 15: We will introduce statutory regulation in line with the other three UK nations requiring Materials Recovery Facilities (MRFs) to report on input and output materials by weight to determine the average percentage of target, non-target and non-recyclable material

Q40. Do you agree or disagree with this proposal?

Agree – government should introduce regulation on MRF reporting

Q41. Do you have any comments or ideas for improving reporting on MRF contamination rates?

This will be necessary to support all stakeholders in delivery of proposal 14.

Proposal 16: Develop an updated set of indicators to monitor overall performance and cost efficiency

Proposal 16: We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency and to highlight where services may be improved. *We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.*

Q42. Do you agree or disagree that a new set of recycling and waste indicators is required?

Agree

Q43. Do you consider that any of the current set of 15 indicators should be removed?

Agree

Q44. If you selected Agree in Q43, which indicators do you think should be removed?

There needs to be flexibility to change over time where local authorities are clearly meeting or exceeding specific outcomes i.e. NILAS.

Q45. Are there any specific recycling and waste indicators for household waste which you think should be included?

Carbon performance and metrics.

Q46. Do you have any general comments to make about performance Indicators?

The cost efficiency comparisons will be difficult as Councils often account for operational costs in different ways. There is also the impact of urban versus rural costs which will have a varied impact across NI Councils.

Proposal 17: Review metrics that focus on environmental emissions from waste in Northern Ireland

Weight (in kilogrammes or tonnes) is currently the common method for the measurement of waste arisings and recycling performance. However, there are other indicators that signal the important economic and social aspects of resource management which may best be reflected using financial and economic measures, such as economic value or jobs created, or social measures, such as well-being.

If Northern Ireland is to become a world leader in resource efficiency, as set out in the Environmental Strategy for Northern Ireland public discussion document (Sept 2019), it will be important that we develop and implement indicators and ways of understanding actual performance – nationally and locally. These should be better suited to reflecting the environmental costs and benefits of managing various waste materials sustainably (environmentally, economically and socially). Discussions with Council representatives have suggested that new ways of measuring waste management performance would be beneficial but should not replace weight-based metrics. Rather, they should be used alongside existing weight-based metrics.

We are not proposing new metrics as part of this consultation but are interested in your views on whether we should supplement weight as the primary means of measuring recycling performance. For example, carbon intensity is one metric that has been used widely as an alternative for measuring recycling performance.

We would like to hear your views on alternative ways of monitoring and reporting the impacts of waste.

Proposal 17: We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.

Q47. Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

Agree

Q48. Do you agree that these alternatives should sit alongside current weight-based metrics?

Agree

Q49. What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

Carbon metric would be welcomed to include whole life carbon impact.

Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland

Public Discussion Document

Abridged Version



Sustainability at the heart of a living, working, active landscape valued by everyone.



Department of
**Agriculture, Environment
and Rural Affairs**

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Contents

Glossary	5
1. Future Recycling and Separate Waste Collection of a Household Nature in Northern Ireland: Summary	7
1.1 Summary of proposals to improve recycling from businesses and other organisations that produce municipal waste which we are seeking views on	8
1.2 Summary of proposals to improve recycling from households in Northern Ireland which we are seeking views on	9
2. Purpose of the Discussion Document	12
3. What Changes are we Proposing?	13
4. Costs of Proposed Waste Management	14
5. Consultation Questions	14
6. How to Respond	26
7. Freedom of Information Act 2000	27

Glossary

AD	Anaerobic Digestion
BID	Business Improvement District
BLACMW	Biodegradable local authority collected municipal waste
CCEN	Collaborative Circular Economy Network
CEP	Circular Economy Package of Directives
Co-mingled	Involves the collection of materials in a single compartment vehicle with the sorting of these materials occurring at a MRF (Materials Recovery Facility).
CWR	Controlled Waste and Duty of Care (Northern Ireland) Regulations 2012
DAERA	Department of Agriculture, Environment and Rural Affairs
DEFRA	Department of Environment, Food and Rural Affairs
DOE	Department of the Environment
EC	European Commission
EfW	Energy from waste
EPR	Extended Producer Responsibility
EU	European Union
GHG	Greenhouse gas
HH	Household waste
HMO	House in Multiple Occupancy
HWRC	Household Waste Recycling Centre
IVC	In Vessel Composting
Kerbside sort	Sorting of materials at kerbside into different compartments of a collection vehicle
Kpi	Key performance indicator
NHM	Non-household municipal waste
MRF	Materials recovery facility
NI CEP Report	Northern Ireland Circular Economy Package Report
NIEA	Northern Ireland Environment Agency
NISRA	Northern Ireland Statistics and Research Agency
PfG	Programme for Government
Recycle Now	The national recycling campaign, supported and funded by Government, managed by WRAP
Recycling Tracker	WRAP's annual survey of UK households that gathers evidence on recycling attitudes, knowledge and behaviour.
Residual	Waste which remains after recycling

rWFD	revised Waste Framework Directive (2008/98)
SDG	United Nations Sustainable Development Goal
TEEP	Technically, Environmentally and Economically Practicable
Two stream	Residents are provided with two recycling containers and are asked to place different materials in each container, typically paper/card (fibre) in one and plastics, glass and cans (containers) in the other. These materials are kept separate but collected on one vehicle which has two chambers.
WasteDataFlow	The web-based system for municipal waste data reporting by UK local authorities to government.
WCLO	The Waste and Contaminated Land (Northern Ireland) Order 1997
WML	Waste Management Licensing Regulations (NI) 2003
WRAP	Waste and Resources Action Programme
UK	United Kingdom

1. Future Recycling and Separate Waste Collection of a Household Nature in Northern Ireland: Summary

Household recycling has long been supported by government in Northern Ireland making it easier for householders to recycle. Through a range of support measures since 2010, Department of Agriculture, Environment and Rural Affairs (DAERA) and its predecessor Department, the Department of the Environment, has invested £40m of support to Councils to increase recycling capacity for dry materials, for food waste and garden waste (organics) and other measures to promote recycling and improve recycling behaviours.

While many Councils continue to make improvements and have introduced new services, some have seen a levelling off in recycling rates. The Department recognises the need to increase the rates of recycling and as a result improve not just the quantity of recyclates but the quality of recyclates going to the re-processors for the end markets. In addition, apart from Landfill Tax, which incentivised diversion from landfill disposal and the introduction of the Food Waste Regulations (Northern Ireland)¹ in 2015 which has significantly helped increase recycling rates of food waste since its introduction, there are very few current drivers to encourage Councils to improve the way they recycle or for businesses to invest in recycling services. This makes it harder to improve the quantity and quality of what we recycle and frustrates householders who want to recycle more but who are increasingly confused over what can and cannot be recycled in their area, which unintentionally leads to mistakes in what is recycled. We want to tackle this confusion and make recycling easier for everyone.

In 2018/19, Northern Ireland's household recycling rate was 50.2%², meeting planned delivery targets. While this is great progress from the low base for recycling in 2000 of 5% with a heavy reliance on landfill, there is more to do. Not only to meet new for increased recycling targets (65%) and reduced landfill targets set within the EU Circular Economy Package (CEP), which will be transposed in July 2020, but to make the most of opportunities to maximise the economic potential of recycling, to make a contribution to meeting future climate change commitments set out in the New Decade, New Approach Deal³ and help the UK reach net zero carbon emissions by 2050⁴

To support this next stage, in 2019, The Department commenced a three-year £23 million capital programme through the Household Waste Recycling Collaborative Change Programme⁵. It provides assistance to Councils to transform kerbside recycling and Household Waste Recycling Centre (HWRC) infrastructure and services. The services and infrastructure being funded will provide Northern Ireland with a sound foundation for the next 10-15 years as the UK and EU moves towards the delivery of a circular economy and contribute to our economic competitiveness and resilience.

A recent WRAP study⁶, (which should be read along with this discussion), has looked at the feasibility of Northern Ireland reaching the 65% recycling targets for the new definition of municipal waste⁷ which will now include business waste of a household nature. The study identified that it is feasible but there would be significantly more business recycling required. The study also identified that medium and larger businesses could reduce their costs by recycling more or it would have a

¹ The Food Waste Regulations (NI) 2015 which amend the Waste and Contaminated Land (Northern Ireland) Order 1997 (S.I. 1997/2778 (N.I. 19)); the Pollution, Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 (S.R.2013 No.160); the Waste Management Licensing Regulations (Northern Ireland) 2003 (S.R.2003 No.493) and the Landfill Regulations (Northern Ireland) 2003 (S.R.2003 No.496)

² <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/lac-municipal-waste-2018-19-report.pdf>

³ <https://www.gov.uk/government/news/deal-to-see-restored-government-in-northern-ireland-tomorrow>

⁴ <https://www.theccc.org.uk/publication/reducing-emissions-in-northern-ireland>

⁵ <https://www.daera-ni.gov.uk/news/daera-pumps-ps23-million-making-recycling-easier>

⁶ <http://www.wrapni.org.uk/content/daera-recycling-discussion-document>

⁷ Municipal Waste is a combination of household waste and household like waste (e.g. paper, packaging and food waste) produced by businesses – it does not include construction and demolition, industrial waste or other waste that are not similar in nature to household waste. See Section 3.1 for full definition.

cost neutral effect. There was some new cost burden identified for small to medium business (SME's); please see the full version of this document for further discussion on this.

The study also indicates that the most appropriate collection models for household collections were those which include the full range of dry recyclable materials that could be collected at kerbside (paper, card, glass, cans, glass, and plastic containers), where food waste would be collected weekly, garden waste collections would remain and some form of further residual restriction could be implemented. The higher capture of food waste and corresponding restriction in residual waste were the most important design factors particularly in being the least costly, complementary and higher performing scenarios.

For wider municipal collections the optimum scenarios were for businesses and the public sector to have regular collections of dry recyclables (paper, card, and drink containers), a separate glass collection where this material was generated, food waste collections for all businesses and a residual collection for any remaining non-recyclable waste material.

Since March 2020, the Covid-19 virus has resulted in significant changes in the operations of businesses and other organisations, including an increase in the number of people working from home or furloughed. These changes have and will continue to impact waste arisings and composition for the foreseeable future. Long term impacts on recycling and waste arisings and operations are unknown and it will take a while to properly understand data to determine the cross sector impacts. The Northern Ireland CEP report study was based on the best available historical data and evidence and WRAP intends to update the CEP analysis in 2020 with the most up to date scheme figures. At some point WRAP will undertake an initial review of the impacts of Covid-19 on the sectors affected in this study to identify any early trends in results and implications on resource management for the next few years.

Notwithstanding the impacts of Covid-19, we think it is the right time to think about how we can best achieve the changes outlined above. In summary we are seeking your views on how to:

- improve the quality of recycled materials as well as increasing the quantity collected;
- ensure there is a strong linkage between waste management and the local economy as opposed to the historical emphasis on solely meeting the EU Directive targets;
- assist in realising the potential economic benefits to the local economy, thus supporting Northern Ireland move towards a circular economy;
- help Northern Ireland improve our 'municipal waste' recycling rates and reduce the amount of materials going to landfill: and
- help reduce carbon emissions, greenhouse gases and pollution in NI.

The measures we are seeking your views on to increase non-household and household recycling are provided below.

1.1 Summary of proposals to improve recycling from businesses and other organisations that produce municipal waste which we are seeking views on

WRAP estimates that between 30-40% of municipal waste which is similar in nature to household waste produced by businesses and other organisations, is currently recycled. Given that the waste composition profiles of these sectors suggest high proportions of recyclable products, this performance could rise to 80%+ with the right measures. This represents a huge opportunity to increase recycling in this sector and a significant step towards a more circular economy.

We are seeking views on a range of proposals to improve recycling from business and other organisations. These are;

- **Proposal 1:** In order to increase food waste collected from the non-household municipal sector, the food waste regulations should be reviewed to ensure obligated businesses segregate food waste for collection
- **Proposal 2:** We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.
- **Proposal 3:** As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.
- **Proposal 4:** We propose to review options to maximise business recycling whilst alleviating cost burden on businesses
- **Proposal 5:** In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to further consultation.

1.2 Summary of proposals to improve recycling from households in Northern Ireland which we are seeking views on.

Members of the public are often confused about what their local Council collects for recycling, by sometimes complex bin rules, as well as inconsistencies between Councils in what they recycle and what can be placed in each bin. As a result, some householders either do not recycle all they can, or they might inadvertently contaminate recycling bins with items that are not collected locally for recycling or that cannot be recycled, (e.g. soiled packaging or nappies). Such contamination can reduce the quality and value of materials recycled and might even lead to whole loads being rejected at reprocessing or sorting centres. Contamination can also reduce demand for secondary materials as producers lose confidence in the flow and quality of recycled materials and turn to primary raw materials instead. NI stakeholders have also stated that the need to improve the quality of recyclate and demand for secondary materials are important preconditions for increasing recycling and to encourage producers and packagers to use more recycled materials.

Building on recent successes for household recycling – WRAP estimates that households have the potential to achieve 58% waste recycling by 2030. Increases from improved HWRC provision are also key and the council role will continue to be vital in enabling this. The challenge is to develop recycling collection systems that can capture increased quantity at the right quality, be economic and at the same time reduce confusion about what can be recycled.

In addition we think these ambitions could be supported by non-binding performance indicators to help Councils to deliver high quantities of good quality recycling. We would want to work with the Councils to develop these indicators and are therefore consulting on what the indicators might look like and whether this approach would assist Councils to help deliver recycling ambitions.

We also recognise that the current weight-based recycling targets favour the collection and recycling of heavy materials, for example garden waste, over other more environmentally-beneficial measures to promote dry recycling. Carbon intensity is one metric that has been used widely as an alternative for measuring recycling performance. Reforms to producer responsibility may drive further changes in product design and make weight-based metrics less effective at driving environmentally sustainable behaviours. We are therefore seeking views on how best to apply supplementary targets to weight-based targets and metrics.

We are seeking views on

- **Proposal 6:** That all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.
- **Proposal 7:** By 2023 to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.
- **Proposal 8:** That all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.
- **Proposal 9:** That the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.
- **Proposal 10:** To review this set of core materials regularly reviewed and, if appropriate, expand over time provided that:
 - evidence supports the benefits;
 - there are viable processing technologies for proposed materials;
 - there are sustainable end markets;
 - Councils would not be adversely affected, including financially.
- **Proposal 11:** We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections assisting Councils and waste operators in decision making on separate collection.
- **Proposal 12:** To provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.
- **Proposal 13:** To continue the support by the Department for Recycle Now^a and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.
- **Proposal 14:** We will work with Councils and others to improve transparency of information available to householders on the end destination for household recycling.
- **Proposal 15:** We will introduce statutory legislation in line with the other three UK nations requiring MRFs to report on input and output materials by weight to determine the average percentage of target, non-target and non-recyclable material.

- **Proposal 16:** We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency as well as to highlight where services may be improved. We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.
- **Proposal 17:** We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.

The discussion that follows sets out the current position of recycling in Northern Ireland, and the current and new regulatory, climate change and market drivers that will influence policy in the future. It will not introduce any new policies, but makes suggestions on possible ways to increase recycling, including case studies of successes in other jurisdictions. It also seeks views on how to best implement the new EU Circular Economy Package (CEP), in particular the changes to the Waste Framework Directive 2008/98/EC, (amended by Directive 2018/851 of 30 May 2018) in relation to separate collection and highlights the benefits of better-quality recyclable materials for the circular economy. It is concerned with measures to improve the quantity and quality of what we recycle both at home and at work in Northern Ireland and we support the view that there is a strong strategic, economic and environmental opportunity to do so. We believe these measures will help to transform recycling in Northern Ireland and to increase recycling rates significantly above 50% towards the much higher recycling rates of 65% by 2035 and landfill rates to 10% by 2035.

Waste and resource management is a devolved matter and this consultation concerns Northern Ireland only. Subject to the outcome of this discussion there will be a further consultation in 2021 on regulatory changes to implement these measures and on potential supporting guidance.

2. Purpose of the Discussion Document

WRAP⁹ estimates that about 56,000 businesses and other organisations in Northern Ireland produce municipal waste within the scope of the CEP (i.e. they generate waste which is similar in nature to household waste). Building on recent successes for household recycling – WRAP estimates that households have the potential to achieve 58% waste recycling by 2030. Increases from improved HWRC provision are also key and the council role will continue to be vital in enabling this. In the non-household municipal sector, and businesses in particular, there is the potential to contribute 80% of the municipal waste recycling target as there is a greater quantity of target recycling materials in non-household municipal streams. The challenge is to develop recycling collection systems that can capture increased quantity at the right quality and be economic.

The purpose of this discussion document is to give you, the stakeholders who will be affected by any decisions taken in the future, an opportunity to express your views on what our recycling environment should look like in the future, and how to improve the quality and quantity of municipal waste recycled in Northern Ireland. We welcome views on how our environmental priorities and objectives could and should be integrated into meeting these targets and how to include businesses and not for profit organisations.

In order to do this we need your views on steps towards improving recycling rates (55% by 2025, 60% by 2030 and 65% by 2035) in household (HH) and non-household municipal (NHM) sectors, how to improve reductions in food waste, cut landfill rates (10% by 2035) and how to get businesses on board. By radically changing the way we think about waste at every level; the producer, the processor, the retailer and the consumer, we can provide a sustainable basis to developing a circular economy and achieve the targets.

We want input from the widest possible range of respondents, and we look forward to receiving responses from all sectors, age-groups, organisations and individuals. Every response will be carefully considered and fed into the policymaking process.

For businesses and other organisations: we are asking for views on requirements for eligible duty holders in this sector (i.e. those businesses and other organisations that produce municipal waste) to separate their dry recyclables from residual waste so that these materials (e.g. plastic packaging, paper, card, metal and glass) can be collected for recycling, similar to households. We are also asking for views on how eligible businesses and other organisations in this sector, especially those that produce food waste in significant quantities, which are already required to be collected separately, should present this separately for recycling.

The changes we propose will help us to:

- meet our EU Withdrawal Agreement obligations to the CEP;
- achieve consistency in the materials collected for recycling;
- divert all food waste from the residual stream;
- make it easier for householders to recycle; and

⁹ <http://www.wrapni.org.uk/content/daera-recycling-discussion-document>

- help to significantly increase the quantity of material collected for recycling from businesses and improve the quality of recycling collected to respond to increasing demand and achieves better value in materials markets.

3. What Changes are we Proposing?

We propose to require all non-domestic businesses, public bodies and other organisations generating municipal waste to have to segregate the four recyclable waste streams glass, paper and card, metal and plastics from residual waste in order for it to be collected and recycled appropriately. The supporting analysis assumed that all businesses could segregate recyclables from residual and that in most cases the core dry recyclables would be collected mixed together.

Further review of the circumstances in which it may not be technically or economically practicable to collect it separately, or in which separate collection may not have significant environmental benefit will be undertaken by government. These proposals are in addition to the existing requirement for food businesses producing >5kg of food waste to separate it for recycling.

At the moment, very little NHM waste is segregated for recycling. Therefore, at the very least, implementation of dry recyclables separated from food waste would improve quality. Ideally, we would want all eligible businesses and other organisations to also separately collect glass and food waste. To make these changes it would be necessary to amend legislation to require businesses and other eligible organisations in this sector to present their waste separately for collection. It might be appropriate to exempt some firms from provisions, similar to current exemptions for food waste. This might be most appropriate for micro firms where the costs of compliance might be higher.

The Department's intention would be to legislate to ensure materials are segregated from residual waste for collection. Detailed requirements on arrangements for segregation of dry materials, glass and food waste would be set out in guidance following a review of the current advice that sets out TEEP. The updated guidance would cover best practice service delivery and options to assist businesses to comply with requirements. Similar to household collections a core set of recyclable materials would be proposed, which allows for differences in the waste material generated by different establishments and the range of materials can be expanded over time.

We would expect businesses to be able to at least segregate recyclable waste from residual waste in all circumstances so that it can be collected and recycled. We would be interested in views on where this may not be practicable for example for technical, environmental or economic reasons. Where waste was not appropriately segregated for collection, the Northern Ireland Environment Agency (NIEA) would be able to take enforcement action, requiring arrangements to be made for segregating waste as necessary.

4. Costs of Proposed Waste Management

Our analysis shows that large and medium-sized firms should benefit financially from greater segregation of materials for recycling and evidence suggests that some may already have such arrangements in place. This would suggest that costs should be manageable for them and benefits should be realised. For some small and micro firms, however, the costs do increase substantially depending on container types and service level offered. It is important to note however that many small and micro businesses use sack type collection systems and so actual costs, particularly under longer term contracts, would be expected to be lower than the numbers outlined above. Without detailed reporting of container systems nationally it is not possible at this stage to estimate costs more accurately.

Regardless of actual costs, it is important to develop options with which to mitigate against any cost increase for businesses. We want to identify ways to reduce the costs of waste collection for this sector and support sustainable recycling behaviour. WRAP UK has worked with small firms and their representatives to explore options for reducing costs; this work is ongoing.

There are a number of measures available that could be used to minimise the costs of waste collection and recycling. We would welcome views on these and also evidence of other measures that may be available to support business recycling and to reduce costs for small and micro firms.

5. Consultation Questions

Proposal 1: In order to increase food waste collected from the non-household municipal sector, the Food Waste Regulations should be reviewed to ensure obligated businesses segregate food waste for collection

Q1. Do you agree or disagree that that the Food Waste Regulations should be reviewed regarding food waste collections from food businesses?

☐ Agree

☐ Disagree (why ...?)

[Free form box]

Q2. If the Food Waste Regulations were to be reviewed which of the following areas should be investigated:

	Strongly Agree	Agree	Disagree
Awareness of the Regulations to obligated businesses			
Requirements to separate food from all business types			
Options to amending the regulations for more business types to be in scope of the requirements			
Access to food recycling services for businesses			
Charging levels for food waste collection services			
Monitoring of business compliance			

Enforcement of business compliance			
Data and reporting of food recycling			

Which other areas of the Regulations, if any, do you think should be investigated?

[Free form box]

Proposal 2: We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.

Q3. Do you agree or disagree that all businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

- ☐ Agree
- ☐ Disagree (why ...?)
- ☐ Not sure/no opinion

Q4. Which of the two options do you favour?

- ☐ Option 1: mixed dry recycling and separate food recycling; no glass recycling
- ☐ Option 2: mixed dry recycling, separate food recycling and separate glass recycling
- ☐ Something else (please expand ...)
- ☐ Not sure/no opinion

Please explain your selection

Q5. We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on a preferred position for instances where this may not be practicable for technical, environmental or economic reasons

- ☐ Yes – it should be practicable to segregate waste for recycling in all circumstances
- ☐ No – some exceptions are needed for particular circumstances (please provide examples below)
- ☐ Not sure/no opinion/not applicable

Q6. Should some businesses, public sector premises or other organisations be exempt from the requirement?

- ☐ Yes (which ones and why ...?)
- ☐ No
- ☐ Not sure/no opinion

Q7. Do you have any other comments to make about Proposal 2? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

[Free form box]

Proposal 3: As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.

Q8. Considering rural needs, what factors should be included in the review of the proposals on non-household municipal waste:

	Yes	No
Cost of recycling services proposed compared to collections in urban areas		
Ability to reconfigure services to alleviate cost burden in rural addresses		
Access to recycling services in rural areas		
Issues with communicating to rural businesses		

Q9. Please list any other factors that should be included in the assessment of the policy proposals specific that may have a different impact on businesses in a rural settlements.

[Free form box]

Proposal 4: We propose to review options to maximise business recycling whilst alleviating cost burden on businesses

Q10. We would welcome views on these options and also evidence of other measures that may be available to support business recycling and to reduce costs for businesses.

Option	Likelihood of increasing recycling without a cost burden to businesses.		
	Very likely	Likely	Unlikely
Improving access to drop off sites and HWRCs for business use.			
More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.			
Providing business advice on optimising/rationalising current services.			
Sharing of containers with neighbouring businesses.			

Regional procurement of services to enable economies of scale and reduce charges levied on businesses.			
One to one support and advice for businesses.			
Clearer information on what materials can be recycled and how.			
On-line tools and calculators to provide information on reducing costs.			
Better data to help businesses measure performance and benchmark.			
Standardisation in pricing approaches from private contractors.			
Combining door to door household and business collections.			
Better access and availability of kerbside services.			
Rewards for businesses that recycle such as incentives, ratings and reduced costs.			
Government or Industry subsidised cheaper costs of collection services.			
Reviewing cross boundary working options (both local authority and national level).			
Clarity in where and how waste and recyclables are treated.			

Other:

[Free form box]

Q11. What are your general views on the options proposed to reduced costs?

[Free form box]

Q12. What might be other viable options to reduce the cost burden that we have not considered?

[Free form box]

Q.13. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

[Free form box]

Proposal 5: In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to further consultation.

Q14. Should businesses and other organisations be required to report data on their waste recycling performance?

- ☐ Yes
- ☐ No Please explain
- [Free text box]
- ☐ Not sure/no opinion/not applicable

Q15. Who should bear the responsibility for reporting data on waste from businesses and other organisations?

- ☐ Producers (businesses and other organisations where waste is produced)
- ☐ Collectors (the organisations responsible for the collection of waste from businesses and other organisations)
- ☐ Re-processors/ treatment facilities (the organisations responsible processing and treatment of waste)
- ☐ Not sure/no opinion/not applicable

Q16. What specific data sets would your organisation find useful if businesses were required to report under Proposal 5?

[Free form box]

Proposal 6: We propose that all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.

Q17. Do you agree or disagree with the proposal that Councils should be required to restrict residual waste capacity (either by frequency or by residual container volume)?

- ☐ Agree – Councils should be required to restrict residual waste capacity
- ☐ Agree – Councils should be required to restrict residual waste capacity **but on the condition** of also enhancing the recycling collections enhancements to recycling collections could be made by either increasing the range of materials collected, increasing the frequency of the recycling collections, or increasing the available recycling container capacity.
- ☐ Disagree – Councils should not be required to further reduce residual waste capacity by any means
- ☐ Not sure/don't have an opinion

Q18. Assuming there will be necessary exemptions for key property types, do you have any preference with the proposals below that Councils should be required to restrict the residual waste in different ways?

(Note that Q17 looks at possible enhancements that could be made to possible restrictions of residual waste)

- ☐ Agree – Councils should be required to restrict residual waste bin volume while retaining existing collection frequency
- ☐ Agree – Councils should be required to restrict residual waste by reducing the collection frequency while retaining the same size container
- ☐ Agree – Councils should be required to restrict residual waste bin volume and reduce frequency
- ☐ Not sure/don't have an opinion

Q19. If residual restriction was to be implemented which enhancements should be made to the recycling service to help increase performance and ensure consumers are satisfied with the overall services offered?

Potential Enhancement	Yes	No
Increased frequency of the dry recyclables collection		
Increased frequency of the food recycling collection		
Larger container capacity for the dry recyclables collection		
A higher frequency sanitary waste collection		
A collection of nappies for young families		
Other (please specify)		

- ☐ Not sure/don't have an opinion

Proposal 7: By 2023 we propose to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.

The following question is designed to consider preferences for the proposal and consultees are encouraged to select more than one option where they may be interested in multiple aspects of the proposal.

Q20. Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(iii) a weekly mixed food and garden waste collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) services to be changed only as and when contracts allow			
(v) providing free caddy liners to householders for food waste collections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For any element of the above question where you answered "disagree" please provide explanation of your views in the box below. For any views on the above or preferences to retain the current fortnightly food waste collection service profile please provide evidence to support your statement.

[Free form box]

Proposal 8: We propose that all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

Q21. Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that Councils should be required to collect a set of core materials for recycling?

- ☐ Agree – Councils should be required, to collect a core set of materials
- ☐ Disagree – Councils should not be required, to collect a core set of materials
- ☐ Not sure/don't have an opinion

Q22. We think it should be possible for all Councils to collect the core set of materials. Do you agree with this?

- ☐ Agree
- ☐ Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

[Free form box]

Q23. What special considerations or challenges might Councils face in implementing this requirement for existing flats and HMOs?

[Free form box]

Q24. Do you have any other comments to make about Proposal 8? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

[Free form box]

Proposal 9: We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q25. Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q26. What other products or materials do you believe should be included in the core set that all Councils will be required to collect?

	This should be included in the core set from the start	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other materials (please specify)				

Q27. If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

[Free form box]

Q28. Do you have any other comments to make about Proposal 9?

[Free form box]

Proposal 10: We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that:

- a) evidence supports the benefits
- b) there are viable processing technologies for proposed materials
- c) there are sustainable end markets
- d) Councils would not be adversely affected, including financially.

Q29. Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- ☐ Yes
- ☐ No
- ☐ Not sure/don't have an opinion

Q30. Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

- ☐ Yes – but I would also add some (please specify which conditions you believe should be added ...)

[Free form box]

- ☐ No – some/all should be removed (if some please specify below)

[Free form box]

- ☐ Not sure/don't have an opinion

Q31. Do you have any other comments to make about Proposal 10?

[Free form box]

Proposal 11: We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections to help Councils and waste operators in decision making on separate collection.

Q32. Do you agree that a review of separate collection requirements is required for Northern Ireland to inform municipal collections in light of proposals for core sets of recyclable materials and new producer obligations under EPR?

- ☐ Yes
- ☐ No (why ...?)
- ☐ Not sure/no opinion/not applicable

Q33. What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide supporting evidence for your statements. Email to: recyclingdiscussion@daera-ni.gov.uk

[Free form box]

Proposal 12: Based on the preceding summary of the key issues, we therefore propose to provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.

Q34. What would be your preferred approach to Government encouraging greater national consistency in collection services?

Proposal	Agree	Disagree	Not sure/don't have an opinion/not applicable
Publish Statutory recycling service guidance to detail service requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Publish Statutory minimum service standards guidance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Publish non-statutory guidance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q35. Do you have any further comments to make about the Proposals outlined above?

[Free form box]

Proposal 13: We will continue the support by the Department for Recycle Now and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.

Q36. Do you have any comments to make about Proposal 13?

[Free form box]

Q37. What information do householders and members of the public need to help them recycle better?

[Free form box]

Proposal 14: We will work with Councils and others to improve transparency of information available to householders on the end destination for household recycling.

Q38. Do you agree or disagree with this proposal?

- ☐ Agree – government should work with Councils and other stakeholders on this
- ☐ Disagree – government should not work with Councils and other stakeholders on this
- ☐ Not sure/no opinion/not applicable

Q39. Do you have any other comments to make about Proposal 14?

[Free form box]

Proposal 15: We will introduce statutory regulation in line with the other three UK nations requiring MRFs to report on input and output materials by weight to determine the average percentage of target, non-target and non-recyclable material

Q40. Do you agree or disagree with this proposal?

- ☐ Agree – government should introduce regulation on MRF reporting
- ☐ Disagree – government should not introduce regulation on MRF reporting
- ☐ Not sure/no opinion/not applicable

Q41. Do you have any comments or ideas for improving reporting on MRF contamination rates?

[Free form box]

Proposal 16: We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency and to highlight where services may be improved. We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q42. Do you agree or disagree that a new set of recycling and waste indicators is required?

- ☐ Agree
- ☐ Disagree
- ☐ Not sure/no opinion/not applicable

Q43. Do you consider that any of the current set of 15 indicators should be removed?

- ☐ Agree
- ☐ Disagree
- ☐ Not sure/no opinion/not applicable

Q44. If you agree with Q43 which indicators should be removed?

[Free form box]

Q45. Are there any specific recycling and waste indicators for household waste which you think should be included?

[Free form box]

Q46. Do you have any general comments to make about performance Indicators?

[Free form box]

Proposal 17: We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.

Q47. Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- ☐ Agree
- ☐ Disagree (why ...?)
- ☐ Not sure/no opinion/not applicable

Q48. Do you agree that these alternatives should sit alongside current weight-based metrics?

- ☐ Agree
- ☐ Disagree (why ...?)
- ☐ Not sure/no opinion/not applicable

Q49. What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

[Free form box]

6. How to Respond

Due to the Covid-19 pandemic the Klondyke Building in Belfast is currently closed to staff. Royal Mail post continues to be delivered to the building and is currently being forwarded on to relevant staff who are working remotely. Therefore post may take longer to process. For this reason, we would ask that in the first instance, you consider responding to this discussion document either directly through the online survey on the DAERA website below or via email to the email address below.

Online Survey

This discussion uses the [Citizen Space](#) Hub as the primary means of response, in order to make it as accessible as possible.

If you are unable to respond to the stakeholder consultation exercise via Citizen Space, written responses will also be accepted and should be sent to:

Single Use Plastics, Waste Prevention and Waste Recycling Policy Team

Environmental Policy Division

2nd Floor, Klondyke Building

1 Cromac Avenue

Gasworks Business Park

Belfast

BT7 2JA

Or e-mailed to: recyclingdiscussion@daera-ni.gov.uk

If you have any queries regarding making a response you can call 02890 569746 for assistance.

Early responses are encouraged but all responses should arrive no later than **4th October 2020 at midnight**. Before you submit your responses please read the "Freedom of Information Act 2000 - Confidentiality of Consultation Responses" section below, which gives guidance on the legal position.

7. Freedom of Information Act 2000

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority (the Department in this case). This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity, should be made public or treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances.

The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.
- For further information about confidentiality of responses, please contact the Information Commissioner's Office:

Tel: (028) 9027 8757

Email: ni@ico.org.uk

Website: <https://ico.org.uk/>

Neighbourhood Services Directorate

Mid Term Assessment




Emergency Business Plan April-September 2020

Introduction

This report provides an overview of progress in delivering the Neighbourhood Services Emergency Business Plan between April-June 2020, across the following service areas, using the legend below.

- Waste Management
- Facilities Management and Maintenance

Legend




Status	
	Target or objective achieved / on track to be achieved
	Target or objective partially achieved / likely to be achieved / subject to delay
	Target or objective not achieved / unlikely to be achieved

Human Resources











Department	Employees (Status as at 30 June 2020)					
	Total	On Site	WFH	At Home (not working)	Re-deployed	Furloughed
Waste Management	264	228	16	20	0	0
Facilities Management and Maintenance	126	106	8	5	3	4
Total Employees	390	334	24	25	3	4

*Given the dynamic nature of Emergency Business Plans, the information contained within this report reflects a specific point in time (30 June 2020) and should therefore be treated as indicative.

Waste Management

Objective / Activity	Timescale	Status	Progress
New			
Prioritisation & protection of the Refuse Collection service ¹	Ongoing		On-going as part of the recovery of other services.
Design and implement social distancing protection for frontline	Ongoing		Complete.
Implementation & operation of a Directorate-wide master rota for the	Ongoing		Complete.









¹ This includes the implementation of several mitigating measures as set-out in the business continuity plan

deployment of workforce resources			
Commence phased re-opening of the Household Recycling Centers	Q1		Phase Two now operable. Currently planning future phases.
Implementation of interim Trade Waste invoicing arrangements	Q1		Complete.
Set up customer services remotely	Q1		Complete.
Essential			
Finalise HRC Phase Two arrangements	Q2		Target Q3
Finalise a suite of Waste Management policies	Q1/2		Target Q3
Commission the development of a Fleet Transition Strategy	Q2		Business case to October NS.
Present options for the distribution of bio bags / caddy liners	Q2		Scheduled for NS Committee consideration in October 2020 along with distribution of Caddy Bins.
Scope business requirement for IT systems to support Waste Management operations	Q2		Subject to completion of external review.
Ongoing / Statutory			
Complete all outstanding tenders and contracts (Waste Processing & Fleet)	Q2		Refer to NS Procurement Action Plan. Procurement process will take action into Q3/Q4.
Waste Data reporting	Ongoing		Ongoing
Desirable			
Implementation of the Enforcement Improvement Plan	Ongoing		Update scheduled to be presented to NS Committee in August/Sept 2020.
Delayed / Suspended			
Design & implementation of a Directorate business administrative support model			Contact Centre concept now being developed with Corporate Services
Areas of Good Practice / Improvement			
COVID adoptions to operations. Recovery phase of services. Major focus on procurement.			

Areas for Business Transformation

NS service improvements including Refuse and creation of Streetscene.










Facilities Management and Maintenance

Objective / Activity	Timescale	Status	Progress
New			
Prioritisation & protection of the Council Burial service ²	Ongoing		On-going as part of the recovery of other services.
Prioritisation & protection of Council essential maintenance service ³	Ongoing		On-going as part of the recovery of other services.
Prioritisation & protection of Council facility management services ⁴	Ongoing		On-going as part of the recovery of other services.
Develop phased recovery plan for reopening of Public Conveniences	Q1		Phase one and two of phased recovery plan complete – 16 of 31 PCs now open (some with reduced hours).
Essential			
Phase 2 extension of Council Municipal Cemeteries – Monkshill and Warrenpoint	By end of Q3		On target for Monkshill Cemetery Phase 2 to be complete in Q3. Tender to be issued in August for Warrenpoint Phase 2 with works complete in Q4.
Preparation for Christmas Illuminations/trees for Christmas 2020	By end of Q2		On target – both tenders have been issued.
Review of Grounds Maintenance Service to account for Covid-19 restrictions	By end of Q2		On-going as part of the recovery of other services.
Resume all standard building maintenance services provision	By end of Q2		On-going as part of the recovery of other services.

² This includes the implementation of several mitigating measures as set-out in the business continuity plan

³ This includes the implementation of several mitigating measures as set-out in the business continuity plan

⁴ This includes the implementation of several mitigating measures as set-out in the business continuity plan

Explore options to digitise all Council Cemetery records	Q2		On target for completion.
Complete Car Park works at Strangford Road Depot	Q1/2		On target for completion.
Develop options for Council on model for Street Scene Service	By end of Q2		Ongoing but likely to move to Q3.
Ongoing / Statutory			
Phase 2 extension to Kilbroney Municipal Cemetery and Phase 3 extension to Monkshill Municipal Cemetery	By end of Q4		On target.
Facility Compliance Management	By end of Q2		2 plans complete, 2 management plans ongoing Q3.
Development of business cases for agreed Public Toilet works (Killough new PC and Castle Park Newcastle PC refurbishment)	Q2		Q3
Commence Public Consultation on Public Convenience Strategy for agreement by Council	By end of Q2 in line with other Council Consultations		Consultation Plan presented to September NS
Develop and implement Council Tree Strategy	By end of Q3		On target.
Desirable			
Review options for Strangford Road Depot	Q2		Delayed.
Delayed / Suspended			
Participation in Ulster in Bloom and Tidy Towns Competitions	N/A		N/A
Roll out of Council Roundabout Sponsorship Scheme	N/A		N/A

Areas of Good Practice / Improvement

COVID adoptions to operations.
Recovery phase of services.
Major focus on procurement.

Areas for Business Transformation

NS service improvements including creation of Streetscene.

DRAFT

Report to:	Neighbourhood Services Committee
Date of Meeting:	22 nd September 2020
Subject:	Memorandum of understanding partnering arrangements for the removal of snow and ice from town centre footways and pedestrian areas
Reporting Officer	Kevin Scullion: Assistant Director: Facility Management & Maintenance
Contact Officer	Aidan Mallon: Head of Maintenance

Confirm how this Report should be treated by placing an x in either:-

For decision	x	For noting only	
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1.0	Purpose and Background
1.1	The purpose of this report is to seek agreement from the Council to a review of the current Memorandum of Understanding (MoU) between Council and the Department for Infrastructure regarding the clearance of snow and ice from town centre footways and pedestrian areas.
1.2	The Council has no legal responsibility for clearing snow and ice from such areas which are under the ownership of the Department for Infrastructure (Dfi).
1.3	<p>The Council has a current MoU with Dfi to partner with them during prolonged periods of snow and ice to clear defined areas of town centre footways and pedestrian areas. This was last agreed at the Neighbourhood Services Committee held in October 2019 for a twelve-month period.</p> <p>Dfi are now seeking to renew the MoU for a three-year period. When this was previously discussed at Committee, Councillors requested that in addition to the areas referred to within the MoU that consideration be given to extending the areas of coverage to include; Crossmaglen, Camlough, Hilltown and Castlewellan.</p> <p>Discussion have been held between Council Officers and Dfi concerning a proposed extension to include these areas in the new MoU. This has been agreed and a copy of the revised MoU is attached at Appendix 1 for review and if agreed approval.</p>
2.0	Key issues
2.1	<ul style="list-style-type: none"> It is anticipated that footways will generally only be considered for treatment after significant snow or ice events although there may be

	<p>occasions when footways could be pre-treated if freezing is forecast following heavy rain.</p> <ul style="list-style-type: none"> It is appreciated that neither DfI Roads nor Newry, Mourne and Down District Council have a statutory obligation to salt footways. The Memorandum shall commence on 1st October 2020 and will remain in force for a maximum period of 3 years.
3.0	Recommendations
3.1	<p>It is recommended to approve the proposal and extend for a further three years, in accordance with the 'Scope of the Agreement' Clause 3 and Appendix 1 as amended, and to sign the updated MOU with additional locations.</p>
4.0	Resource implications
4.1	<p>Council staff resources will be resourced from within existing salaries and wages Revenue Budgets from within the Directorate Maintenance Service.</p> <p>It is not possible at this stage to quantify the level of expenditure as this will depend on the extent of use of the MoU.</p>
5.1	<p><i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i></p> <p>It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations</p>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened</p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation</p>
5.3	<p><i>Proposal initiating consultation</i></p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves</p> <p>Consultation period will be 12 weeks</p> <p>Consultation period will be less than 12 weeks (rationale to be provided)</p>

	<i>Rationale:</i>
6.0	Due regard to Rural Needs (please tick all that apply)
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment completed</p> <p>If no, please complete the following:</p> <p>The policy / strategy / plan / public service is not influenced by rural needs</p>
7.0	Appendices
7.1	Appendix 1: Proposed Memorandum of understanding partnering arrangements for the removal of snow and ice from town centre footways and pedestrian areas between the Department for Infrastructure and Newry, Mourne and Down District Council. (Note: Awaiting amended version for signing with correct start date of 1 st October 2020)
8.0	Background Documents
8.1	None

**Memorandum of Understanding
Of
Partnering Arrangements
between
DfI Roads and Newry, Mourne & Down District Council
for
Clearing Busy Town Centre Footways and Pedestrian Areas of Snow and Ice.**

Introduction

1. The purpose of this Memorandum of Understanding (MOU) is to set out the basis of partnering arrangements between DfI Roads and Newry, Mourne and Down District Council for the treatment of snow and ice from busy town centre footways during prolonged periods of wintry weather. It is anticipated that footways will generally only be considered for treatment after significant snow or ice events although there may be occasions when footways could be pre-treated if freezing is forecast following heavy rain.
2. It is appreciated that neither DfI Roads nor Newry, Mourne and Down District Council have a statutory obligation to salt footways and are not resourced for this work but under this MOU footway clearance and salt/grit spreading may be undertaken by DfI Roads and/or Newry, Mourne and Down District Council staff, depending on resources available at the time.
3. This MOU sets out a broad framework of key principles agreed by the DfI Roads, the Northern Ireland Local Government Association (NILGA) and the Society of Local Authority Chief Executives (SOLACE) to be put forward for consideration and agreement by individual local councils.
4. It is anticipated that these key principles will be specifically tailored at local level, to take account of council preferences/restraints. For example should existing local arrangements between DfI Roads Section Offices and local councils be deemed appropriate by all parties, these arrangements can be retained, subject to agreement and to a schedule of work being agreed by all.

Objectives

5. The objectives of the Memorandum of Understanding are to:
 - Provide an agreed framework which local offices can build on to formalise the level of service to be provided by each organisation in those areas;
 - Define each organisation's duties and obligations in delivering this service;
 - Establish a schedule of footways to be treated in the event of prolonged periods of wintry weather;

- Promote an efficient and co-operative working relationship between both organisations.

The Role and Commitments of DfI Roads

6. DfI Roads shall lead consultation, ultimately to be agreed by individual councils, on a schedule of main village/ town/ city centre footways to be treated. This is attached as Appendix 1.
7. DfI Roads shall lead consultation, ultimately to be agreed by individual councils, when a salting operation should be carried out, on the basis of conditions, weather information and the availability of resources. The rationale supporting this decision making process should be developed locally.
8. DfI Roads will provide Newry, Mourne and Down District Council with salt, or a salt/grit mix, free of charge to treat those footways on the schedule, when required. DfI Roads shall confirm the availability of and determine the release of salt or salt/grit mix required; and such availability and its release will be subject to DfI Roads resources and it being required by Newry, Mourne and Down District Council.
9. DfI Roads will extend the indemnity being offered to Newry, Mourne and Down District Council and their authorised agents, as defined in paragraph 14 of this MOU.

The Role and Commitments of Councils

10. During extreme conditions following heavy snowfalls or prolonged freezing council staff may assist the Department with footway clearance and salt/grit spreading on an agreed schedule of footways depending on resource availability at the time.
11. Newry, Mourne and Down District Council will nominate a representative to be responsible for the council's contribution to the treatment of snow and ice from busy town centre footways during prolonged periods of wintry weather and to attempt to resolve any difficulties or problems that may arise.
12. Newry, Mourne and Down District Council will assist DfI Roads in developing a rationale for when a salting operation should be carried out, on the basis of conditions, weather information and the availability of resources etc.
13. Newry, Mourne and Down District Council may delegate their responsibilities under this Memorandum in whole or in part to businesses, trading organisations, and community groups ("authorised Council Agents") within their council areas, which are willing to undertake this work. Newry, Mourne and Down District Council shall be responsible for coordinating and supervising the work of their authorised Council Agents.

14. Newry, Mourne and Down District Council will work in close liaison with the DfI Roads Section Engineer's staff in order to maximise efforts and co-ordinate the deployment of the DfI Roads and the Council's workforce, which may comprise both the employees and contractors of the Council, their Trading Organisation Agents and community groups.
15. Newry, Mourne and Down District Council shall provide sufficient supervisory staff for the personnel employed to carry out the work. Personnel employed to carry out the work shall include the servants and employees and contractors of the Council and the authorised Council Agents.

Legislation

16. Article 8 of the Roads (Northern Ireland) Order 1993 ("the Roads Order") of the Roads Order imposes a statutory duty to maintain roads (including footways) adopted for maintenance by the Department. While DfI Roads has no statutory obligation to salt roads Article 9 of the Roads Order provides the Department with the legal right to exercise a discretionary power to take such steps as it considers reasonable and practicable to prevent snow and ice interfering with the safe passage of persons or vehicles using a road.
17. For that purpose it may also enter into agency arrangements with any persons for the treatment of roads affected by snow and ice.
18. Newry, Mourne and Down District Council is empowered by Sections 104 and 105 of the Local Government Act (NI) 1972 to exercise functions on behalf of and to enter into arrangements with a government department for the supply of services.
19. Under these arrangements DfI Roads is prepared to offer Newry, Mourne and Down District Council the same range of defences that are available to the Department. This indemnity will include groups of traders or community groups operating on the Councils behalf.
20. This means that Councils that enjoy discretionary delegated powers can run the same defences as are available to DfI Roads. Newry, Mourne and Down District Council shall indemnify DfI Roads against any claims made against DfI Roads arising from allegations of negligence or fault on the part of the Council, their staff, contractors or authorised Council Agents in carrying out work under this MOU.

Terms and Conditions of the Memorandum.

21. The Memorandum shall commence on 1st October 2019 and will remain in force for a maximum period of 3 years. It replaces any previous winter service agreements between DfI Roads and Newry, Mourne and Down District Council.
22. Either DfI Roads or the Newry, Mourne and Down District Council may seek amendments to the Memorandum at any time.

- 23. Subject to the consent of both DfI Roads and Newry & Mourne District Council the Memorandum may be extended at one year intervals.
- 24. The Memorandum may be terminated by either party with 6 months written notice.
- 25. The effectiveness of these arrangements will be reviewed in April of each year. Further analysis of actual costs to carry out this work in order to advocate the finances necessary to undertake this work will also be undertaken in April of each year.

The Signatories

Both organisations signify below their acceptance of the Memorandum on the terms and conditions set out

Signed on behalf of Newry Mourne & Down District Council.

Date:

Signed on behalf of DfI Roads.

Date:

APPENDIX ONE

FOOTWAYS AND PEDESTRIAN AREA

ICE AND SNOW CLEARANCE – PRIORITY 1 / PRIORITY 2

ROAD	EXTENT	OTHER COMMENTS
		Refer to attached schedules identifying locations agreed with Councils

Appendix One lists the footways to be treated in priority order

APPENDIX ONE

FOOTWAYS AND PEDESTRIAN AREA

ICE AND SNOW CLEARANCE – PRIORITY 1 / PRIORITY 2

ROAD	EXTENT	OTHER COMMENTS
<u>DOWNPATRICK</u>	<u>PRIORITY ONE</u>	
Market Street	Irish Street to entrance to Leisure Centre	
Irish Street	From Scotch Street to entrance to Irish Street car park	
English Street	From Church Street junction for a distance of 50m	
Church Street	From Scotch Street to entrance to Church Street car park	
Scotch Street	From Church Street junction for a distance of 50m	
<u>NEWCASTLE</u>		
Main Street	From Railway Street to Central Promenade	
Central Promenade	From Main Street to Bryansford Road	
Railway Street	From entrance to car park at Percy French to Junction with Donard Street	
Donard Street	From Railway Street to Bryansford Avenue	
Bryansford Avenue	From junction with Main Street for a distance of 50 m	

Appendix One lists the footways to be treated in priority order

ICE AND SNOW CLEARANCE – PRIORITY 1 / PRIORITY 2

ROAD	EXTENT	OTHER COMMENTS
<u>BALLYNAHINCH</u>		
Main Street and High Street	From Harmony Road to Dromore Road roundabout	
	<u>PRIORITY TWO</u>	
<u>BALLYNAHINCH</u>		
Harmony Road, Windmill Street	From Main Street junction to High Street Junction	
<u>CASTLEWELLAN</u>		
Main Street/Dublin Road	From Clarmont Place to Bann Road roundabout	
Upper Square	Main Street	
Newcastle Road	From Main Street to petrol filling station	
	<u>PRIORITY TWO</u>	
	Lower Square Castlewellan	
<u>KILLYLEAGH</u>		
Catherine Street, Cross Street	From Plantation Street to Frederick Street	
High Street	From Castle to Catherine Street	

Appendix One lists the footways to be treated in priority order

ICE AND SNOW CLEARANCE – PRIORITY 1 / PRIORITY 2

ROAD	EXTENT	OTHER COMMENTS
<u>NEWRY</u>		
Priority 1 Hill Street and John Mitchell Place, Newry	Kildare Street to William Street	Including Marcus Street and Mall to Bus Centre Pedestrian Entrance
Priority 2 Monaghan Street, Newry	Merchants Quay to Patrick Street	Including Patrick Street to SRC
<u>Other Areas</u>		
Mill Street, Buttercrane Quay and Bridge Street	Hill Street to Francis Street to Dublin Bridge to jct Bridge Street car park access road	

Appendix One lists the footways to be treated in priority order

ICE AND SNOW CLEARANCE – PRIORITY 1 / PRIORITY 2

ROAD	EXTENT	OTHER COMMENTS
<u>KILKEEL</u>	<u>Priority 2</u>	
Bridge Street, Kilkeel		
Greencastle Street, Kilkeel	From Bridge Street to Hotel	
Newry Street, Kilkeel	From Bridge Street to Town Hall	
Newcastle Street, Kilkeel	From Bridge Street to Asda	
<u>WARRENPOINT</u>	<u>Priority 2</u>	
The Square/Main shopping area, Warrenpoint	The Square Church Street Duke Street Dock Street	
<u>CROSSMAGLEN</u>	<u>Priority 2</u>	
	Footpaths around O'Fiaich Square	
<u>CAMLUGH</u>	Newry Road	
<u>HILLTOWN</u>	Newry Road/Castlewellan Road	

Appendix One lists the footways to be treated in priority order

Report to:	Neighbourhood Services Committee
Date of Meeting:	22 nd September 2020
Subject:	Report on request to extend Council Christmas displays
Reporting Officer	Kevin Scullion, Assistant Director, Facilities Management & Maintenance Department
Contact Officer	Kevin Scullion, Assistant Director, Facilities Management & Maintenance Department

Confirm how this Report should be treated by placing an x in either: -

For decision	X	For noting only
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1.0	Purpose and Background				
1.1	The purpose of this report is to complete a recommendation arising from the Neighbourhood Services Committee meeting in August 2020 concerning requests to extend the Council Christmas display for 2020.				
1.2	The request to be considered are: 1. Providing Christmas Illuminations adjacent to Ross Monument Rostrevor 2. Extending Festoon lighting at Newcastle Harbour to the end of the pier. 3. Lighting up an Oak tree along North Promenade Newcastle.				
1.3	Attached at Appendix 1 are photographs of each of the areas with a short summary of the proposal and estimated costs.				
1.4	The table below summarises the costs for the three proposals.				
	Project	New Product Costs	Installation Cost £	Running annual costs £	Total for year 1 £
	Ross Monument Rostrevor	£2200	£400.00	£30.00	£2630.00
	Newcastle Harbour	£500.00	£300	negligible	£800.00
	Oak tree along North Promenade Newcastle	£1400	£4450.00	£300.00	£6150.00
2.0	Key Issues				
2.1	<ul style="list-style-type: none">• The Council provides a Christmas display in Newry City, several towns and villages throughout the district council area.• A report was provided to this Committee in March 2020 to appoint a contractor to provide the service of testing, repair, erection and removal of Christmas illuminations which was based on current display. It is possible				

	to extend this display, but additional costs and recurring annual costs would arise from such a decision as detailed in the report.
3.0	Recommendations
3.1	<ul style="list-style-type: none"> Note the content of the report. Officers recommendation is to proceed with request for Ross Monument, Rostrevor, and with request at Newcastle Harbour (subject to agreement with the Commissioner of Lights). Not to proceed with request to provide lights to oak tree at North Promenade Newcastle.
4.0	Resource implications
4.1	<p>Funding of this project will be through the revenue budget held by Neighbourhood Services Directorates.</p> <p>The Council has a budget of £135,000 in this current year for the testing, repair, erection and removal of Christmas illuminations. About 40% of this budget is known at this stage as these are fixed costs but there are many unknown costs at this stage which may fully use the remaining 60% of the budget available.</p> <p>Therefore, it is currently not known if agreeing to these projects will result in an overspend in this budget.</p>
5.1	<p><i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i></p> <p>It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations</p>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened</p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation</p>
5.3	<p><i>Proposal initiating consultation</i></p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves</p> <p>Consultation period will be 12 weeks</p> <p>Consultation period will be less than 12 weeks (rationale to be provided)</p> <p><i>Rationale:</i></p>

6.0	Due regard to Rural Needs (please tick all that apply)
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment completed</p> <p>If no, please complete the following:</p> <p>The policy / strategy / plan / public service is not influenced by rural needs</p>
7.0	Appendices
7.1	Appendix 1 – Proposed extensions to Council Christmas display
8.0	Background Documents
8.1	Not applicable

Appendix 1 – Proposed extensions to Council Christmas display

99

Ross Monument Rostrevor

The request is to provide Christmas pole illuminations at Ross Monument location on the entrance to Rostrevor. There are already pole illuminations in Rostrevor but this would provide a small number on the corner of the road, adjacent to a layby using existing Dfi lampposts.

There is potential to use spare existing pole illuminations rather than procure new illuminations.



Budget cost:

Year 1 - Supply of 4 no pole mount features £1,000

Recurring Costs - Installation and removal including access equipment £400.00

Year 1 cost - 16amp commando sockets would require installed by DRD est. £1200

Annual running costs - £30.00

Electricity costs - negligible

Newcastle Harbour Pier:

Council provides Festoon lighting along the pier at Newcastle Harbour as shown in the attached photograph. Currently provides this for approximately 100-metre stretch. Request is to extend this to end of pier, a further 20 metres.

This is possible and would be circa 20 metre extension, but it would be necessary to make the final connection to the existing lighted Navigational Aid which is shown in the photograph below.

Advice from the Commissioner of Lights has been asked about this proposal and if available for meeting Councillors will be advised.



Budget cost – estimate £500 in year 1

Recurring costs – £300

Electricity costs - negligible

Newcastle Harbour Tree:

Proposal is to provide lighting to an Oak tree located at the North Promenade, Newcastle, as shown in the attached photograph.

There is no power source close to tree. Closest power is at the public toilets 50m away. Estimate to install a submains cable and carry out board works, and excavation works and installation of mini pillar.



Budget cost to illuminate tree:

Year 1 Product – £1,400.00 + vat

Year 1 Installation including access equipment - £1,200.00 + vat

Year 1 Power connection - £3250.

Recurring costs £300

Electric costs - negligible

Report to:	Neighbourhood Services Committee
Date of Meeting:	22 nd September 2020
Subject:	Phase 3 Reopening of Public Conveniences
Reporting Officer (Including Job Title):	Kevin Scullion Assistant Director of Facilities Management & Maintenance
Contact Officer (Including Job Title):	Gail Kane Head of Facilities Management

Confirm how this Report should be treated by placing an x in either:-

For decision	<input checked="" type="checkbox"/>	For noting only	<input type="checkbox"/>
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1.0	Purpose and Background
1.1	<p>Following the closure of all Public Conveniences as part of the lockdown because of the Covid-19 Pandemic, the Council's Public Conveniences have been operating a restricted service.</p> <p>Currently there are 16 No. of the Council's 31 No. Public Conveniences reopened. The first 6 facilities were reopened on Saturday 13th June 2020, with a further 10 facilities reopened on Saturday 20th June 2020.</p>
1.2	<p>These 16 No. facilities (see Appendix 1 for list of facilities) have received an enhanced daily cleaning service from their reopening. They were specifically selected due to having a high footfall and being in tourist areas, and those facilities where logistics/operations allowed for cleansing.</p>
1.3	<p>The purpose of this report is to present details of the reopening of the Public Conveniences to date, and to also advise on the reopening of a further 6 No. Public Conveniences.</p> <p>It should be noted that Struell Cemetery facilities cannot be reopened due to the fire damage to the building, and Rostrevor facilities are currently contained within an ongoing Capital Project scheme together with 16 The Square, Rostrevor.</p>
2.0	Key issues
2.1	<p>Adopting a phased approach to the reopening of the Public Conveniences is required, balancing service provision, resources and the health and safety of the Public and Council staff.</p> <p>Cleansing has been carried out using a combination of Seasonal/Permanent staff and Contractors.</p>

	<p>A review of servicing and reduction in PC opening hours due to normal seasonal changes, together with reduced footfall means additional units can be reopened as part of our phased recovery plan, using existing resource levels.</p> <p>Therefore, it is proposed to open a further 6 No. facilities as listed below, based on locations that can be serviced to suit existing resource levels and logistical considerations, these are: -</p> <ul style="list-style-type: none"> • Loughross • Hilltown • Dundrum • Castlewellan • Ardglass • Lough Inch
2.2	Out of the 16 No. facilities which are now open, 4 No. of those facilities are due to close again at the end of September in accordance with the Council's normal seasonal operating arrangements. They are Cranfield, Spelga, Ballyhornan and The Quoile. Officers are recommending that these 4 facilities would also remain open.
2.3	There will be an additional operational cost of approximately £10,000 per month above budget for cleaning the Public Conveniences due to the additional Covid requirements and cleaning. This is based on existing external contract cleaning costs. However, Officers will review to ensure the most efficient methods are used to undertake cleaning utilising both internal and external resources.
3.0	Recommendations
3.1	It is recommended to approve the 6 No. additional Public Conveniences as part of the phased recovery plan are reopened from 1 st October 2020.
3.3	It is recommended to have Cranfield, Spelga, Ballyhornan and The Quoile remain open during the Winter months while the other 7 No. facilities remain closed, until the next phase of the recovery of PCs.
3.4	It is recommended to approve the overspend of approximately £10,000 per month due to the additional Covid measures required.
4.0	Resource implications
4.1	To continue with current resources for cleaning of the PC's detailed with the contents of the report, there is an estimated additional cost of £10,000 per month. These additional costs are offset to the end of September partially by seasonal staff budget. However, it should be noted that from 1st October 2020 this additional cost will be an overspend on Revenue Budget.
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)
5.1	<i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i>

	It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations <input type="checkbox"/>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened <input checked="" type="checkbox"/></p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation <input type="checkbox"/></p>
5.3	<p><i>Proposal initiating consultation</i></p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves <input checked="" type="checkbox"/></p> <p>Consultation period will be 12 weeks <input checked="" type="checkbox"/></p> <p>Consultation period will be less than 12 weeks (rationale to be provided) <input type="checkbox"/></p> <p><i>Rationale:</i></p>
6.0	Due regard to Rural Needs (please tick all that apply)
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment complete <input checked="" type="checkbox"/></p>
7.0	Appendices
	Appendix 1: List of Public toilets currently open
8.0	Background Documents
	Neighbourhood Services Phased Reopening of Public Conveniences document.

Appendix 1: List of Council Public Toilets currently open

- Downs Road, Newcastle
- Donard Park, Newcastle
- Bloody Bridge
- The Quoile, Downpatrick
- Ballyhornan
- Warrenpoint Park
- Castle Park, Newcastle
- Central Promenade, Newcastle
- South Promenade, Newcastle
- Spelga
- Cranfield
- Crossmaglen
- Kilkeel
- Market Street, Downpatrick
- Warrenpoint Square
- Newry Market



Newry Mourne and Down Public Toilet Strategy

Privacy Notice

Purpose:

To be complete

Privacy notice and consent

* 1. Agree and Continue?

☐ Yes

Next



Newry Mourne and Down Public Toilet Strategy

Overall Strategy

2. A copy of the strategy is available at this [link](#). Overall how satisfied are you with the strategic approach set out within the strategy?

- ☐ Very satisfied
- ☐ Satisfied
- ☐ Neither satisfied or dissatisfied
- ☐ Dissatisfied
- ☐ Very dissatisfied

3. Please make any comments relating to the overall strategy below

Prev

Next

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Newry Mourne and Down
Public Toilet Strategy

Key Recommendations

4. The strategy contains 9 of key recommendations, to what extent do you agree with these?

The Council will:

	Strongly Agree	Agree	Neither Agree nor disagree	Disagree	Strongly Disagree
Remain committed to providing a Public Toilet Service across the district.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Undertake identified capital and revenue works to improve its existing Public Toilet provision and where feasible meet newly identified need.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consider corporate branding facilities as part of future capital and revenue works to improve existing Public Toilet provision. Ensure the needs of people with Autism, Dementia and other health conditions are considered as part of future capital and revenue works to improve existing Public Toilet provision.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review the opening/closing times of its Public Toilets and consider extending these to meet identified need.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review how its Public Toilets are managed, cleaned and maintained with the view of reducing inconsistencies and providing an improved service.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consider including other suitable Council facilities, Public buildings and private businesses as part of the overall Public Toilet provision.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consider providing Changing Places facilities as part of its Public Toilet provision.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investigate the introduction of charging at some facilities as a means of reducing vandalism and anti-social behaviour.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consider how information concerning the location and availability of its Public Toilet provision can be made available to all user groups.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Comments

YES

NO



Newry Mourne and Down
Public Toilet Strategy

Equality and Rural Needs

To help ensure that we have fully understood any equality of opportunity and good relations implications or rural needs, we would appreciate your feedback on these issues.

6. Are you aware of any equality of opportunity, good relations or rural needs implications associated with this strategy?

PrevNext



Newry Mourne and Down
Public Toilet Strategy

Other Comments

7. Is there anything else you would like to add?

PrevNext





Newry Mourne and Down Public Toilet Strategy

The questions below relate to yourself, these answers will be treated confidentially. We will use the answers within this section to monitor how effectively we have engaged across the community.

8. Gender

- ☐ Male
- ☐ Female
- ☐ Other

9. Do you have any long-term illness, health problem or disability which limits your daily activities or the work you can do?

- ☐ Yes
- ☐ No

10. What age are you?

- | | |
|-------------------------------|-------------------------------|
| <input type="radio"/> 0-4 | <input type="radio"/> 50 - 54 |
| <input type="radio"/> 5-9 | <input type="radio"/> 55 - 59 |
| <input type="radio"/> 10 - 14 | <input type="radio"/> 60 - 64 |
| <input type="radio"/> 15 - 19 | <input type="radio"/> 65 - 69 |
| <input type="radio"/> 20 - 24 | <input type="radio"/> 70 - 74 |
| <input type="radio"/> 25 - 29 | <input type="radio"/> 75 - 79 |
| <input type="radio"/> 30 - 34 | <input type="radio"/> 80 - 84 |
| <input type="radio"/> 35 - 39 | <input type="radio"/> 85+ |
| <input type="radio"/> 40 - 44 | |
| <input type="radio"/> 45 - 49 | |

11. Please enter your postcode



Newry Mourne and Down
Public Toilet Strategy

12. If you are responding on behalf of an organisation, please give your name and the name of the organisation below.

Prev

Done

Report to:	Neighbourhood Services Committee
Date of Meeting:	22 nd September 2020
Subject:	Public Convenience Strategy – 12-week Public Consultation
Reporting Officer	Kevin Scullion, Assistant Director of Facilities Management & Maintenance
Contact Officer	Gail Kane, Head of Facilities Management

Confirm how this Report should be treated by placing an x in either:-

For decision	<input type="checkbox"/>	For noting only	<input checked="" type="checkbox"/>
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1.0	Purpose and Background
1.1	The purpose of this report is to provide the Committee with a copy of the Draft Public Convenience Strategy's 12-week Consultation document for its review prior to issue.
1.2	In February 2020 this Committee and subsequently Full Council endorsed the draft Public Toilet Strategy. One of the recommendations from the Committee was that there should be a public consultation exercise on the recommendations from the draft strategy.
1.3	<p>The key recommendations within the draft Public Toilet Strategy are as detailed below.</p> <ul style="list-style-type: none"> • Council will remain committed to providing a Public Toilet Service across the district; • Council will undertake identified capital and revenue works to improve its existing Public Toilet provision and where feasible meet newly identified need. • Council will consider corporate branding its facilities as part of future capital and revenue works to improve existing Public Toilet provision. Ensure the needs of people with Autism, Dementia and other health conditions are considered as part of future capital and revenue works to improve existing Public Toilet provision. • Council will review how its Public Toilets are managed, cleaned and maintained with the view of reducing inconsistencies and providing an improved service.; • Council will consider including other suitable Council facilities, Public buildings and private businesses as part of the overall Public Toilet provision; • Council will consider providing Changing Places facilities as part of its Public Toilet provision; • Council will investigate the introduction of charging at some facilities as a means of reducing vandalism and antisocial behaviour; • Council will consider how information concerning the location and availability of its Public Toilet provision can be made available to all user groups.
1.4	Officers will commence the 12-week online consultation with participants asked to select options between Strongly Agree, Agree, Neither Agree or Disagree, Disagree or Strongly Disagree regarding each of the key recommendations within the draft strategy. See copy of consultation documentation attached at Appendix 1.

	<p>There will also be a section for participants to add in any additional comments on the Strategy they believe is relevant.</p> <p>The findings from the public consultation will be reported back to this committee prior to finalising the strategy.</p>
2.0	Key issues
2.1	<ul style="list-style-type: none"> • The Council does not have a statutory duty to provide a Public Toilet service, but it does through the provision of 31 Public Toilets. • The Council receives no income from the provision of this service. • Council has committed to reviewing the current service provision with the view to providing a better service than currently exists and has showed willingness to commit capital spend to improve existing facilities and provide new facilities. • The Council has agreed a draft Public Toilet Strategy and now seeks to consider comments on the recommendations from the draft Strategy through a public consultation exercise prior to finalising the strategy. • The implementation of the strategy if agreed will require several work packages to be agreed and implemented. The process for agreeing such work packages will provide the Council with opportunities to review and agree to potential costs for the continuation of the service or changes to how the service is delivered across the council or within particular geographic areas.
3.0	Recommendations
3.1	Note the content of the report.
4.0	Resource implications
4.1	Staff time to undertake the publishing of the consultation document and analysis of the returns.
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)
5.1	<p><i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i></p> <p>It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations <input checked="" type="checkbox"/></p>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please complete the following:</p>

	<p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened <input checked="" type="checkbox"/></p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation <input type="checkbox"/></p>
5.3	<p><i>Proposal initiating consultation</i></p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves <input checked="" type="checkbox"/></p> <p>Consultation period will be 12 weeks <input checked="" type="checkbox"/></p> <p>Consultation period will be less than 12 weeks (rationale to be provided) <input type="checkbox"/></p> <p><i>Rationale:</i></p>
6.0	<p>Due regard to Rural Needs (please tick all that apply)</p>
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment completed <input checked="" type="checkbox"/></p>
7.0	<p>Appendices</p> <p>Appendix 1: Copy of 12-week Public Convenience Consultation document.</p>
8.0	<p>Background Documents</p> <p>Draft Public Consultation Strategy.</p>

Report to:	Neighbourhood Services (NS) Committee
Date of Meeting:	22 September 2020
Subject:	Annual Cost of District Cleansing & Enforcement
Reporting Officer (Including Job Title):	Joe Parkes, Assistant Director: Waste Management
Contact Officer (Including Job Title):	Liam Dinsmore, Head of Waste Processing & Enforcement

For Decision		For Noting Only		X									
1.0	Purpose & Background												
1.1	The purpose of this report is to provide the Committee with financial information on the annual cost of the District Cleansing and Enforcement services. This followed a request made by the Committee at its Meeting on the 19 August 2020.												
2.0	Key issues												
	<u>Annual Cost (2019-20)</u>												
2.1	Based on the financial out-turn for 2019-20, the total annual cost (payroll & non-payroll) for the District Cleansing and Enforcement services were as follows:												
	<table><tr><th></th><th>2019-20 Annual Budget</th><th>Total Annual Cost (Actual)</th></tr><tr><td>District Cleansing</td><td>£2,223,257</td><td>£1,911,709</td></tr><tr><td>Enforcement</td><td>£211,689</td><td>£118,281</td></tr></table>					2019-20 Annual Budget	Total Annual Cost (Actual)	District Cleansing	£2,223,257	£1,911,709	Enforcement	£211,689	£118,281
	2019-20 Annual Budget	Total Annual Cost (Actual)											
District Cleansing	£2,223,257	£1,911,709											
Enforcement	£211,689	£118,281											
	<u>District Cleansing</u>												
2.2	The table below provides a comparison with previous financial years. Members are asked to note that the figures presented form part of the Council's annual submission of performance information to APSE (as part of a statutory Duty of Improvement). These gross costs also exclude Central Establishment Charges as per APSE parameters ¹ . The 2019-20 figures have yet to be finalised and validated with APSE.												
	<table><tr><th></th><th>2016-17</th><th>2017-18</th><th>2018-19</th></tr><tr><td>District Cleansing</td><td>£2,398,781</td><td>£2,408,405</td><td>£2,803,894</td></tr></table>					2016-17	2017-18	2018-19	District Cleansing	£2,398,781	£2,408,405	£2,803,894	
	2016-17	2017-18	2018-19										
District Cleansing	£2,398,781	£2,408,405	£2,803,894										
2.3	Further analysis on the annual cost of the District Cleansing service can be provided based on the gross cost of the service per household. This is provided below in the table below. As with the costs provided above, the 2019-20 figures have yet to be finalised and validated with APSE.												
	<table><tr><th></th><th>2016-17</th><th>2017-18</th><th>2018-19</th></tr><tr><td>District Cleansing</td><td>£36.48</td><td>£36.77</td><td>£43.10</td></tr></table>					2016-17	2017-18	2018-19	District Cleansing	£36.48	£36.77	£43.10	
	2016-17	2017-18	2018-19										
District Cleansing	£36.48	£36.77	£43.10										

¹ Data submitted to APSE operates within several parameters to support performance comparisons with other Local Authorities. The data is verified & checked by APSE.

2.4	Members will also be aware the Council participates in the annual Keep NI Beautiful "Cleaner Neighbourhoods" exercise. The 2019-20 version of the report was presented to the Committee at its August 2020 Meeting, which enables further performance benchmarking with other Councils. As requested at the August NS Committee meeting, contact has been made with other Councils for additional benchmarking information, which is incomplete in respect of responses at this stage, however this information will be presented to the NS Committee in October.												
	Enforcement												
2.5	<p>The table below provides a comparison of the cost of the Enforcement service with previous financial years. Members are asked to note the figures presented do not currently form part of the annual submission to APSE and are therefore not subject to external assessment and validation. Furthermore, the scope of Enforcement activities includes the enforcement of littering, fly-tipping and dog fouling; it is not currently possible to separate the costs of each function.</p> <p>Table 4.</p> <table><tr><th></th><th>2016-17</th><th>2017-18</th><th>2018-19</th></tr><tr><td>Enforcement</td><td>£172,235</td><td>£146,288</td><td>£145,946</td></tr></table>		2016-17	2017-18	2018-19	Enforcement	£172,235	£146,288	£145,946				
	2016-17	2017-18	2018-19										
Enforcement	£172,235	£146,288	£145,946										
2.6	<p>Members will also be aware the Council derives an income (via Fixed Penalty Notices / FPNs) from its enforcement activities. Based on the number of FPNs issued in each of the corresponding years, the indicative income² from this source equates to the following:</p> <table><tr><th></th><th>FPNs Issued</th><th>Income</th></tr><tr><td>2017-18</td><td>73</td><td>£5,840</td></tr><tr><td>2018-19</td><td>59</td><td>£4,720</td></tr><tr><td>2019-20</td><td>84</td><td>£6,720</td></tr></table>		FPNs Issued	Income	2017-18	73	£5,840	2018-19	59	£4,720	2019-20	84	£6,720
	FPNs Issued	Income											
2017-18	73	£5,840											
2018-19	59	£4,720											
2019-20	84	£6,720											
3.0	Recommendations												
3.1	<p>Members are asked to:</p> <ul style="list-style-type: none">Note the contents of the report.												
4.0	Resource implications												
4.1	There are no specific resource implications attached to this report as its sole purpose is to provide the Committee with financial information.												
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)												
5.1	<i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i>												

² £80.00 per each FPN (reduced to £50.00 if paid within a specified timeframe)

	It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations	<input checked="" type="checkbox"/>
5.2	<i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please complete the following: The policy (strategy, policy initiative or practice and / or decision) has been equality screened <input type="checkbox"/> The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation <input type="checkbox"/>	
5.3	<i>Proposal initiating consultation</i> Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves <input type="checkbox"/> Consultation period will be 12 weeks <input type="checkbox"/> Consultation period will be less than 12 weeks (rationale to be provided) <input type="checkbox"/> <i>Rationale:</i>	
6.0	Due regard to Rural Needs (please tick all that apply)	
6.1	Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please complete the following: Rural Needs Impact Assessment completed <input type="checkbox"/>	
7.0	Appendices	
7.1	▪ None	
8.0	Background Documents	

8.1	<p>Annual Rates Estimates Process</p> <p>Enforcement Improvement Plan Report to NS Committee, 19 June 2019</p> <p>Enforcement Improvement Plan Update Report to NS Committee, 23 October 2019</p> <p>Enforcement Improvement Plan Update Report to NS Committee, 19 August 2020</p>
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Report to:	Neighbourhood Services (NS) Committee
Date of Meeting:	22 nd September 2020
Subject:	Household Recycling Centres (HRCs) Re-opening Plan Update
Reporting Officer (Including Job Title):	Joe Parkes, Assistant Director: Waste Management
Contact Officer (Including Job Title):	Liam Dinsmore, Head of Waste Processing & Enforcement

Confirm how this Report should be treated by placing an x in either:-

For decision		For noting only	X
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1.0	Purpose and Background
1.1	The purpose of this report is to provide a further update to the Committee on the re-opening of the Council's Household Recycling Centres (HRCs), in accordance with social distancing measures by the NI Executive and resource availability. A previous update on the implementation of this plan was considered by the Committee at its last meeting in August (Appendix 1).
2.0	Key issues
2.1	<p>The reopening plan presented at the August Committee has been implemented:</p> <ul style="list-style-type: none"> Continuing to operate the Newry, Kilkeel, Camlough, Warrenpoint, Downpatrick, Castlewellan & Ballynahinch sites on a 5-day basis (Monday – Friday) from 10.00am – 4.00pm, based on the continuation of a three-person staff model. Crossmaglen HRC opening Monday-Wednesday and Newtownhamilton HRC opening Thursday-Friday, using a dual-staffing operation. The closing of the Warrenpoint, Crossmaglen and Newtownhamilton sites for 30 minutes during the day (from 12.30pm-1.00pm with last permitted entry at 12.15pm), again to enable dual-staffing operation.
2.2	In addition to the reopening plan detailed in 2.1, Hilltown HRC is now open Thursday-Friday from 10.00am – 4.00pm, excluding lunch requirements 12.30pm-1.00pm. This now means that all ten HRC sites are operational on reduced hours.
	<u>Next Phase</u>
2.3	<p>The next proposed phase of the re-opening plan is in two parts:</p> <ol style="list-style-type: none"> The opening of the HRC sites on a Saturday on reduced hours 10.00am – 4.00pm. Once phased one is achieved, then further extension of the HRC opening hours, similar to pre Covid-19. <p>To facilitate, we are in the process of recruiting additional agency staff, to allow for the extra hours and additional operating controls during Covid-19.</p>

2.4	Members are asked to further note that Officers continue to keep under constant review plans for the HRC recovery. Successfully achieving this will be dependent upon the continual mitigation of Covid-19 related risks, the continuing availability of staffing resources, as well as consultation with Staff and Trade Unions representatives. Regarding timescales for the next proposed phase members will be kept up to date on developments in writing, however, the aim is that Saturday opening will commence in a matter of weeks, subject to resource issues highlighted in this report.
2.5	Elected Members, as well as the general public, will be kept informed of future service changes as they come into place. External communications will be supported via the use of the Council's social media channels and website.
3.0	Recommendations
3.1	Members are asked to: <ul style="list-style-type: none"> Note the update in relation to the next phase of the re-opening of the Council's Household Recycling Centres (HRCs)
4.0	Resource implications
4.1	Additional short term staff will be used to allow for the proposed extended opening hours and Covid-19 risk assessment requirements.
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)
5.1	<p><i>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</i></p> <p>It is not anticipated the proposal will have an adverse impact upon equality of opportunity or good relations <input checked="" type="checkbox"/></p>
5.2	<p><i>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</i></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>The policy (strategy, policy initiative or practice and / or decision) has been equality screened <input type="checkbox"/></p> <p>The policy (strategy, policy initiative or practice and / or decision) will be subject to equality screening prior to implementation <input type="checkbox"/></p>

5.3	<p>Proposal initiating consultation</p> <p>Consultation will seek the views of those directly affected by the proposal, address barriers for particular Section 75 equality categories to participate and allow adequate time for groups to consult amongst themselves <input type="checkbox"/></p> <p>Consultation period will be 12 weeks <input type="checkbox"/></p> <p>Consultation period will be less than 12 weeks (rationale to be provided) <input type="checkbox"/></p> <p><i>Rationale:</i></p>
6.0	<p>Due regard to Rural Needs (please tick all that apply)</p>
6.1	<p>Proposal relates to developing, adopting, implementing or revising a policy / strategy / plan / designing and/or delivering a public service</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes, please complete the following:</p> <p>Rural Needs Impact Assessment completed <input type="checkbox"/></p>
7.0	<p>Appendices</p>
	<p>Appendix 1 – previous update to the NS Committee, 19th August 2020</p>
8.0	<p>Background Documents</p>
	<p>None</p>

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13th August 2020

Mr Tim Walker
arc21
Belfast Castle
Antrim Road
Belfast
BT15 5GR

Our Ref: **arc21/ Draft Reconciliation 2019/20**

Dear Mr Walker

**The Landfill Allowance Scheme (NI) Regulations 2004 (As amended)
15th Scheme Year 2019/20 – Draft Reconciliation**

Under Regulation 13 of the above Regulations, the Monitoring Authority (NIEA) is required to prepare a draft reconciliation in relation to each District Council no later than 5 months after the end of the scheme year.

Regulation 14 requires the Monitoring Authority as soon as reasonably practicable after the end of the reconciliation period to reconcile the allowances available with the amount of Biodegradable Local Authority Collected Municipal Waste (BLACMW) sent to landfill as calculated under Regulation 13.

Through WasteDataFlow **arc21** has submitted quarterly returns for the scheme year 2019/20. From these returns NIEA has calculated¹ the amount of Biodegradable Local Authority collected Municipal Waste (BLACMW) sent to landfill by each District Council for the scheme year 2019/20.

The total amount of BLACMW sent to landfill by arc21 for the scheme year 2019/20, was 87,238 tonnes¹ equating to 67.17 % utilisation of the 129,879 allocated allowances available for the scheme year.

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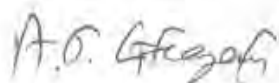
To date, the Monitoring Authority has not received any requests for the transfer of allowances for the scheme year 2019/20. As this *scheme year is a scheme target year* the **borrowing of allowances is not permitted.**

The form required for transfer of allowances is available on the NIEA website at:
<https://www.daera-ni.gov.uk/publications/nilas-forms>.

Transfer requests must be completed i.e. NIEA must have received an appropriately authorised request - an original signature is required - on the official form no later than six months after the end of the scheme year i.e. by **Wednesday 30th September**.

Please do not hesitate to contact us with any queries.

Yours sincerely,



Adrian Gregory (Dr)

Control and Data Management

¹The mass balance is detailed at:

[https://www.wastedataflow.org/documents/guidancenotes/NorthernIreland/LandfillAllowanceScheme/KPI_\(g\)_DC_Mass_Balance_Schematic_v4.pdf](https://www.wastedataflow.org/documents/guidancenotes/NorthernIreland/LandfillAllowanceScheme/KPI_(g)_DC_Mass_Balance_Schematic_v4.pdf)

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Table: NILAS progress – 15th Scheme Year (2019/20)
Regulation 13 Draft Reconciliation

District Council/ Waste Management Group	2019/20 Allocation	BLACMW (') sent to landfill for scheme year 2019/20 (As reported)	BLACMW (') sent to landfill as % of 2019/20 allocation
Antrim & Newtownabbey Borough Council	16,788	10,988	65.45%
Ards & North Down Borough Council	19,017	15,762	82.88%
Belfast City Council	40,289	30,299	75.20%
Lisburn & Castlereagh City Council	16,444	14,373	87.40%
Mid & East Antrim District Council	16,387	13,684	83.50%
Newry Mourne & Down District Council	20,954	2,133	10.18%
arc21:	129,879	87,238	67.17%

(') BLACMW = Biodegradable Local Authority Collected Municipal Waste ¹

¹ The Landfill Allowances Scheme (Amendment) Regulations (Northern Ireland) 2011

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From: DAERA Waste Framework & Environmental Liability Team <WasteFramework@daera-ni.gov.uk>

Sent: 17 August 2020 15:34

To: DAERA Waste Framework & Environmental Liability Team <WasteFramework@daera-ni.gov.uk>

Subject: Circular Economy Package Policy Statement

CAUTION: This email originated outside of Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Circular Economy Package Policy Statement

A UK wide Circular Economy Package (CEP) Policy Statement has recently been published setting out the key changes made by the CEP and the approach of the UK to transposition of the 2020 CEP measures. The UK, Welsh, Scottish and Northern Ireland governments have decided to take the approach of issuing this public statement and not to run a formal consultation. The bulk of the 2020 CEP measures are relatively small technical changes and, where appropriate, the implementing legislation will simply adopt the same wording as that of the Directive.

Further information can be found on the DAERA website at the following link.

<https://www.daera-ni.gov.uk/articles/circular-economy-package-policy-statement>

In addition, on some of the longer term key strategic waste issues such as how to increase recycling, the Department will be undertaking further policy work and engagement - for example, DAERA has recently published a discussion document on the '[Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland](#)' and more information on this can be found on the Department's website.

Regards

Waste Legislation Team

Waste Legislation Team
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Department of
**Agriculture, Environment
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***Sustainability at the heart of a
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A statement issued jointly by the Department for Environment, Food and Rural Affairs (Defra), the Department of Agriculture, Environment and Rural Affairs (DAERA), the Welsh Government and the Scottish Government.

Executive summary

The UK is committed to moving towards a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them, minimizing waste and promoting resource efficiency. The [Circular Economy Package \(CEP\)](#) introduces a revised legislative framework, identifying steps for the reduction of waste and establishing an ambitious and credible long-term path for waste management and recycling.

Many of the themes and provisions covered within the CEP relate to areas of resources and waste policy where the UK nations are already actively involved through existing measures or work underway to take forward commitments made in their respective domestic waste strategies; The [Resources and Waste Strategy \(RWS\)](#) for England forms part of the UK government's commitment in the [25 Year Environment Plan](#) for England to leave the environment in a better state than we inherited it. The Welsh Government's strategy, Beyond Recycling, sets out its aim of making a circular, low carbon economy in Wales a reality with a set of key actions to deliver the objective of zero waste by 2050. The Scottish Government's circular economy strategy, [Making Things Last](#), published in 2016, sets out a clear vision and priorities for action to move towards a more circular economy; and Scotland set a series of ambitious targets to drive circularity. In Northern Ireland, the Department of Agriculture, Environment & Rural Affairs (DAERA) is currently developing the "Environment Strategy for Northern Ireland" which will consider the main long-term environmental priorities for Northern Ireland.

This statement sets out the key changes made by the CEP and the approach of the UK to transposition of the 2020 CEP measures. The UK, Welsh, Scottish and Northern Ireland governments have decided to take the approach of issuing this public statement and not to run a formal consultation. The bulk of the 2020 CEP measures are relatively small technical changes and/or the implementing legislation simply adopts the same wording as that of the Directive. We have already consulted on some of the key changes in the CEP, as did the European Commission in [2013](#) and [2015](#) during negotiations. Where stakeholder input has been required to develop new guidance, informal engagement has taken place with impacted stakeholders. The Regulatory Triage Assessment is published alongside this statement and shows a net present social cost of £13.4 million. The net direct cost to business is estimated to be £2.6 million per year.

The UK government has stated that leaving the EU has not changed our world leading ambitions on the environment, and we have no intention of weakening our current environmental protections after the end of the Transition Period. We have a long history of environmental protection supported by a strong legal framework which pre-dates membership of the EU, and we will safeguard and improve on this record. Moreover, we recognise the benefits of shifting to a more resource efficient and circular economy as a means of not only reducing impacts on our natural environment and reducing greenhouse gas emissions, from disposal and embodied emissions related to our consumption, but also in terms of competitiveness, resilience and growth. All four nations have committed to continuing to enhance environmental protections, recognising the need to accelerate action to address the climate emergency.

Annex I provides details of 2020 measures and our approach to transposing them. Annex II contains the Regulatory Triage Assessment and Annex III outlines proposed guidance updates regarding the Packaging and Packaging Waste Directive.

Introduction

Shifting towards a more circular economy will mean we optimise our use of resources within the economy by increasing the duration of a product's useful life and ensuring when a product has reached the end of its life its resources can be productively used repeatedly, so creating further value. Consequently, the added value in products remains in the systems for as long as possible, so reducing waste. The transition to a more circular economy requires changes throughout value chains, including product design, new business and market models, novel ways of turning waste into a resource and changes to consumer behaviour. The move to a more circular economy will bring the four UK nations environmental, financial and social benefits.

Circular Economy Package

Turning waste into a resource is part of 'closing the loop' in circular economy systems. The UK's ambition to move to a circular economy is reflected in many of the changes required as part of the [Circular Economy Package \(CEP\)](#). The revised legislative framework on the circular economy identifies clear steps for the reduction of waste and establishes an ambitious and credible long-term path for waste management and recycling. The amendments include the alignment across three Directives of definitions, terms and powers, plus measures to streamline and simplify reporting requirements and tackle specific waste issues.

As part of their comprehensive negotiations on the package, of which the UK voted in favour, the EU Commission undertook public consultations on the circular economy in [2013](#) and [2015](#). During these and latter stages of negotiations, Defra held regular discussions with key stakeholders on the possible implications of the proposals. The European Parliament and the Council of Ministers jointly agreed the final package in May 2018, which was subsequently published in the Official Journal on 14 June 2018 and came into force on 4 July 2018. The CEP aligns with the collective ambition of the UK nations to move towards a circular economy and implementation will ensure that the UK government maintains and could exceed environmental standards now we have left the EU.

This statement summarises the 2020 CEP changes required and our planned approaches for transposition (see Annex I for more details).

Scope

The bulk of substantive changes to laws, regulations and administrative provisions made under the CEP affect three Directives:

- a. [Directive 2008/98/EC](#) on waste (the Waste Framework Directive (WFD)), amended by [Directive \(EU\) 2018/851](#) of 30 May 2018
- b. [Directive 94/62/EC](#) on Packaging and Packaging Waste (PPWD), amended by [Directive \(EU\) 2018/852](#) of 30 May 2018
- c. Directive 1999/31/EC on the Landfill of waste (LFD), amended by [Directive \(EU\) 2018/850](#) of 30 May 2018

The three remaining Directives amended by the CEP are the End-of-Life Vehicles (ELV) ([Directive 2000/53/EC](#)), Batteries and Accumulators and Waste Batteries and Accumulators (BAWBA) ([Directive](#)

[2006/66/EC](#)) and Waste Electrical and Electronic Equipment (WEEE) ([Directive 2012/19/EU](#)). These have all been amended by a single amending, [Directive \(EU\) 2018/849](#). The changes made to these three Directives are relatively minor and either do not need transposing or measures are already in place to meet the requirements.

Geographical extent

The four administrations have worked together in putting this statement together and will continue to do so while moving through the rest of the transposition process.

Some amendments being made by the Secretary of State will apply to England, Scotland, Wales and Northern Ireland. These will relate to existing legislation which applies on a UK- or GB- wide basis or to those regulations that are not devolved. Scotland and Northern Ireland will also make their own regulations which will transpose the non-UK wide elements of the CEP into their own domestic legislation.

The Secretary of State will be making the legislative changes required to transpose the 2020 CEP measures on behalf of England and Wales, apart from some amendments including those relating to hazardous waste which Defra are making on an England-only basis. The Welsh Ministers will be seeking the consent of Senedd Cymru for the Secretary of State to make the legislative changes on their behalf. In parallel, any amendments to Wales only legislation will be made by Welsh Ministers, in free-standing, Wales-only regulations.

Transposition approach

The UK, Welsh, Scottish and Northern Ireland governments have decided that the 2020 CEP measures will be transposed as described in this public statement, without a formal consultation, given the changes are relatively minor and technical. In addition, different parts of the UK, in some cases, have already introduced policies which are considered sufficient to meet the revised EU legislation, and consultations are taking place on other policy areas linked to the transition to a more circular economy.

In terms of CEP measures to be transposed by 2020, a combination of non-legislative changes and legislative changes with a minor impact (mainly 'copy out' i.e. the implementing legislation adopts the same wording as that of the Directive), will transpose most of the requirements of the CEP. Amendments to Articles 10(4), 18, and 21(1)(c) and Article 35(1) & (4) of the WFD and Article 5(3)(f) of the Landfill Directive require slightly more extensive changes. These latter Articles focus on landfill and incineration restrictions of separately collected waste, and hazardous waste amendments. The full list of 2020 CEP changes required is provided in Annex I.

Some of the measures will require changes to existing guidance, or new guidance to be written, and this will be published in due course. Annex III explains the proposed guidance updates regarding the Packaging and Packaging Waste Directive.

Impacts of CEP changes

We have assessed the impacts of the changes and the Regulatory Triage Assessment (RTA) is provided (Annex II). The cumulative impact of the amendments to Articles 10(4), 18, and 21(1)(c) and Article 35(1) & (4) of the WFD and Article 5(3)(f) of the LFD will result in a net present social cost of £13.4m. The net direct cost to business is £2.6m per year, and this excludes benefits to mechanical biological treatment and recycling facilities. The remaining CEP 2020 measures are currently understood to be very low or no-cost to either businesses or the public sector.

In Wales, landfills generally do not receive separately collected fractions, and Energy from Waste facilities (incinerators) are not authorised to accept separately collected recyclate unless it can be demonstrated that it is unsuitable for recycling and therefore expect no impact on Welsh operators and no increase in cases per year. In Wales, the municipal waste and landfill targets are also being transposed. They will not introduce additional impacts to those already identified by the Welsh Government when introducing their targets and policies.

Approaches to waste policy across the UK

Waste policy is largely a devolved matter in the UK; therefore, in Scotland, Wales and Northern Ireland, the devolved administrations are responsible for strategy and policy relating to waste management. EU waste legislation can be directly transposed by regulations in each of the countries. However, despite differences between the devolved administrations in the specifics of policy measures, national priorities and strategies for waste have been consistent in aiming to drive action further up the waste hierarchy and working to move to a more circular economy.

England

How the CEP aligns with our strategies

Recent government strategies that consider resources and waste in England include:

- [The 25 Year Environment Plan](#): This sets out a policy framework for the production stage, giving producers a clear roadmap of how we will double resource productivity and achieve zero avoidable waste by 2050. Now we have left the EU, the UK's overarching 25 Year Environment Plan will continue to set our direction
- [Clean Growth Strategy](#): Commits to exploring new and innovative ways to manage emissions from landfill.
- [Industrial Strategy](#): Sets out our aim for broader outcomes to be considered at the design stage of major projects and encouraging a cultural change – where consumers look at the whole life value of a product rather than focusing on the up-front cost
- [Litter Strategy for England](#): A circular economy which encourages re-use and minimises the amount of waste generated – harmonises with the aims of the Litter Strategy to reduce the waste that ends up in our rivers, seas and our country overall
- The [Resources and Waste Strategy \(RWS\)](#) demonstrates our ambition to move to a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them and promoting resource efficiency. The transposing SI also puts into law our commitment in the RWS to recycle 65% of municipal waste and to have no more than 10% of municipal waste going to landfill by 2035

Wales

Circular economy policy in Wales

In December 2019, the Welsh Government consulted on a new circular economy strategy for Wales – Beyond Recycling. The consultation closed in late April 2020 having engaged around 1,000 citizens and stakeholders. It proposed the next steps in the pathway towards a circular economy in Wales through strategic aims to become a zero waste, net zero emissions nation that uses a fair share of the earth's resources whilst realising the economic potential this transition brings.

A new circular economy strategy for Wales will be published in 2020. It will also build on the current strategy [Towards Zero Waste \(TZW\)](#), the overarching Waste Strategy for Wales. One of the key features of TZW was that it set recycling targets for local authorities (which were made statutory under the Waste (Wales) Measure 2010) which has seen Wales become a global leader in waste management and well on course to reach 70% municipal waste recycling by 2025. TZW is supported by a suite of [sector plans and other documents](#) that together comprise the waste management plan (WMP) for Wales. TZW sets out the importance of looking after our resources efficiently. Together, the waste plan documents embrace all of the key concepts of a circular economy approach.

The Welsh Government also identifies the circular economy as a key part of its [Economic Action Plan](#) and its [Natural Resources Policy](#). Resource efficiency is also a key component of the legislative framework in Wales included in the 'Prosperous Wales' goal under the [Well-being of Future Generations \(Wales\) Act 2015](#).

Northern Ireland

In Northern Ireland, the "Environment Strategy for Northern Ireland" is currently under development and will consider the main long-term environmental priorities for Northern Ireland. This will form the basis for a coherent and effective set of interventions that can deliver improvements in the quality of the environment, thereby creating opportunities to develop the economy, improve the health and well-being of citizens and play a part in protecting the global environment.

In addition, [Economy 2030](#) – the draft Industrial Strategy for Northern Ireland, published in 2017, sets out an ambitious plan to build a globally competitive economy based around five pillars of growth.

The Northern Ireland waste management strategy, [Delivering Resource Efficiency](#), was published in 2013 sets a direction towards using waste more efficiently to make it a key element in developing and promoting a low carbon, circular economy. It supports the CEP waste package and will be revised in due course, taking the results of a series of consultations into consideration.

A [discussion document](#) on the future of recycling and the separate collection of waste of a household nature in Northern Ireland was issued in June and provides the public and businesses with the opportunity to influence how these key aspects of the CEP are implemented in Northern Ireland.

Scotland

Scottish circular economy and waste policy

The Scottish Government has long recognised the benefits of a circular economy approach. In 2016, we launched 'Making Things Last', which laid the foundations for action by setting out a vision and priorities for action for building a circular economy in Scotland. This means minimising the population's demand on primary resources and maximising the re-use, recycling and recovery of resources, rather than treating them as waste. Many of the Scottish Government's circular economy targets and policy commitments align with and already go beyond the requirements of the CEP.

Scottish Government recently [consulted](#) on legislative proposals to further embed an innovative approach to reducing, reusing and recycling materials and help to deal with items that we know cause environmental harm. Other measures in place, or planned, to manage and reduce waste and promote a more circular economy in Scotland include:

- [improving resource efficiency](#) through actions such as discouraging use of single-use materials
- introducing a [Deposit Return Scheme](#) for drinks containers
- supporting delivery partners to tackle [litter and fly-tipping](#)
- taking advice from the [Expert Panel on Environmental Charging and other measures](#)
- funding [Zero Waste Scotland](#) to deliver waste-reducing initiatives
- funding the [Scottish Environment Protection Agency \(SEPA\)](#) to regulate on the treatment and disposal of waste

Contact us

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MEMBERS' MONTHLY BULLETIN

The purpose of this Bulletin is to provide Members with an executive summary of the various agenda items which will be considered by the Joint Committee at its forthcoming meeting.

The titles highlighted in blue relate to the various agenda items.

Item 1 - Conflicts of Interest

The Joint Committee are reminded of their personal responsibilities and asked to declare any conflicts of interest that might arise during the meeting.

Item 2 - Apologies

Item 3 - Minutes of Joint Committee Meeting 048 held on 30 July 2020

For approval

The Joint Committee's approval is sought for the minutes of the meeting JC048 held on 30 July 2020.

Item 4 - Matters Arising

'IN COMMITTEE' ITEMS - COMMERCIALY CONFIDENTIAL

Item 5 - Minutes of Joint Committee Meeting 048 held on 30 July 2020 'in committee'

For approval

The Joint Committee's approval is sought for the minutes of the meeting JC048 held on 30 July 2020 'in committee'.

Item 6 - Matters Arising

Item 7 - Residual Waste Treatment Project

Item 7.1 - Update Report

For noting

Planning Application – The planning application continues to be considered by officials within the Department for Infrastructure. A statutory consultee response is still outstanding from DAERA.



Communication – In response to representations made by the objector group, Noarc21, to Members in arc21 councils in the form of queries (which were subsequently forwarded on to arc21) a response was released to each of the councils earlier this month for issue to their Members. A report on Noarc21 presentation to the Joint Committee and the Joint Committee site visits has been compiled and is within this month's Joint Committee minutes for consideration.

A "*points of contention*" information summary regarding issues commonly raised has been included in this report.

Eunomia April 2018 Report - A copy of the report prepared by Eunomia dated April 2018 is included in Annex 1.

The Joint Committee is asked to note the contents of the report.

Item 7.2 - Noarc21 Presentation & Site Visits Report

For noting

On 19 November 2019, Noarc21 presented to the Joint Committee. They welcomed this opportunity and highlighted their issues and concerns, as well as making a number of statements.

Following this presentation, arc21 requested that Noarc21 collate these concerns and submit them in writing so they Officers could consider them and respond. However, to date this has not been forthcoming.

In addition to the Noarc21 presentation, as there were many new Joint Committee Members and to provide some context as to how energy-from-waste (incinerators) operated, arc21 organised site visits to two facilities – the Indaver facility at Duleek (on 5 November 2019) and the Covanta facility at Poolbeg (on 3 December 2019).

These are not direct comparators with the proposed development at Hightown Quarry as they are stand-alone energy-from-waste (EfW)/(incinerator) plants. The residual waste treatment project (RWTP) called for a suite of integrated facilities which could directly contribute to the development of the Circular Economy in Northern Ireland. Namely a mechanical-biological treatment facility to capture additional recyclables from the residual waste stream and prepare a homogenous fuel for the EfW plant and a visitor/education centre plus ancillary facilities.

The education and visitor centre which could be used as a discovery space for community groups, schools, universities and also to be a community resource. The infrastructure associated with the proposed development at Hightown Quarry could also enable other decarbonisation initiatives– such as the provision of district heating and the production of carbon neutral or zero carbon fuels.



The project is needed to address pressing waste management challenges such as avoiding the potent greenhouse gas emissions from landfill, increasing recovery from waste of materials and energy recycling and to improve our society's sustainability and resilience. In addition, there is considerable scope and opportunities for environmental enhancements and sustainable economic activities at the site for the future. However, these are dependent upon arc21 being granted planning permission to develop Hightown Quarry the in line with planning application reference T/2014/0114/F submitted on 27 March 2014.

The Joint Committee is asked to note the report.

Item 8 - Commercially Sensitive Procurement and Contract Issues

For approval

The contracts for the Loading Haulage and Transfer of Residual Municipal, Co-mingled Dry Recyclable and Organic Wastes, Street Sweepings and Bulky Wastes (Lots 1 and 2) and the Receipt, Processing, Treatment, Recycling and Disposal of Street Sweepings Waste (Lots 1 and 2) will be due to expire later in the year. Due to the impact of COVID-19 these procurements have not yet commenced and the report recommends a further short extension to enable the procurements to be undertaken and the award process completed.

It will be necessary for arc21 to issue a Regulation 34 Notice, under the Waste Electrical and Electronic Equipment Regulations, to a Service provider to ensure that there is continuity of service for the collection of Display (TV's and Monitors) from designated points within the arc21 area.

The Joint Committee is asked to agree the recommendations and to note the remainder of the report.

OUT OF COMMITTEE & RETURN TO MAIN AGENDA

Item 9 - Contracts and Operations Briefing Report

For noting

arc21 continues to manage and monitor the impact of COVID-19 on its contracts.

Operationally the contracts continue to perform effectively and the frequency of any changes has significantly reduced.

The new contracts for Municipal Waste Disposal became live on 1 August.

In terms of NILAS the department has issued the draft reconciliation for the 2019/20 year. All of the arc21 councils individually came within their allocated allowances.

The Joint Committee is asked to note the report.



Item 10 - Annual Review of Waste Statistics 2019/20

For noting

The Joint Committee is asked to note the statistical information relative to key waste statistics covering the year 2019/20.

Item 11 - Council Covid-19 Waste Management Financial Losses

For noting

To date two bids totalling £10m have been submitted by the 11 Councils to DAERA covering the estimated losses on waste management activities arising from the Covid-19 emergency, £5.7m for the March to June period and £4.3m for the July to September period.

In terms of the first bid, the Executive awarded £3.8m to DAERA to allocate to Councils and DAERA originally provided a further £0.9m. However, the DAERA Minister then reversed the decision and withdrew the £0.9m.

DAERA have introduced a formal and bureaucratic administrative process for Councils to claim the financial support and to date none of the £3.8m awarded by the Executive has been allocated by the Department, although a payment on account of 70% is expected to be paid when the claim process gets underway.

DAERA submitted the second bid to the Department of Finance (DoF) but this was not approved leaving Councils, already in a financial crisis, to fund the remaining £7.2m.

Following the allocation of the initial support by the Executive Councils were encouraged to present bids for the remainder of the year, taking into account the fact that Covid-19 losses are expected to continue to be incurred and Treasury had provided further financial support to the devolved administrations.

Councils asked DAERA to submit a bid to the Executive for a further £10m for the period October to March but with the second bid not being accepted by DoF, this bid was not presented by DAERA, leaving the Councils in an even worse financial position and having to make critical decisions without the funding support being available to cover the extra costs.

Treasury provided the Executive with an additional £600m as part of its financial support to the four devolved administrations but it is understood that DoF prioritised the funding to Health, Education and the Third/Voluntary Sector.

This is very disappointing news for Local Government in terms of waste management as well as other services provided by Councils which have now been forced into a deeper financial crisis as a consequence of the Covid-19 emergency and lack of Government support.



DAERA have indicated that there may be the potential for additional funding through the quarterly Expenditure Monitoring Rounds and regular engagement with the Department will continue in order to maximise the level of funding support available.

The Joint Committee is asked to note the report.

Item 12 - Statement of Accounts for the Year to March 2020

For noting

As a Local Government Body, the Joint Committee is required to produce annually a statement of its financial position for the year and present a report to the Department for Communities to enable the Local Government Auditor to undertake the statutory audit of the accounts.

The Draft Statement of Accounts for the year to March 2020 was presented to the Audit Committee on 27 July 2019 and, following approval, submitted to the Department for the Communities to enable the Local Government Auditor to carry out the statutory audit.

Extracts from the accounts are shown in Appendix C and Appendix D but the financial highlights of the year are as follows:

- Income at £29.5m is broadly in line with prior year's income of £29.6m.
- The General Reserves increased by £237k from £1,255k to £1,492k, with approximately 50% of the reserves earmarked for the Residual Waste Treatment Project and the development of the Waste Management Plan, placing the organisation in a strong position to meet the challenges ahead.
- The pension scheme remains in a deficit position increasing by £567k to £1,072k (from £505k) following the triennial review of the pension scheme by NILGOSC.
- At 31 March 2020 the Joint Committee held cash balances of £3.2m compared to £2.6m at 31 March 2019 providing sufficient working capital to meet the monthly contractual obligations of the organisation, which are circa £3m per month.

The final accounts are expected to be certified by the Local Government Auditor in December and then presented to the Joint Committee in January 2021.

The Joint Committee is asked to note the report.

Item 13 - Corporate Plan 2020-24

For approval

The updated Corporate Plan is now provided to the Joint Committee for consideration and approval prior to implementation.



Item 14 - Human Resources Issues

For approval

Organisation Resilience Review

At the 30 May 2019 Joint Committee meeting, Members agreed, following changes to the organisation structure, to endorse an external review of the resilience of the organisation.

Subsequently, using the Local Government Staff Commission Consultancy Framework, a procurement competition was undertaken and HeadsTogether Consulting Limited was awarded the contract on 2 August 2019.

The resilience review was initially delayed due to the imminent retirement of the former Acting Chief Executive and the commencement of the new Acting Chief Executive on 1 October 2019.

In parallel, developments were underway with the councils' strategic review of the delivery of waste management services on an NI-wide basis which may have implications for arc21 and then there was COVID 19 which led to a reprioritisation of our services for several months.

It is now deemed appropriate not to undertake this work and to await the final outcome of the councils' strategic review to enable the Joint Committee to assess the implications for arc21 including undertaking an organisational review, if appropriate, at that stage.

The Joint Committee is asked to endorse the approach set out above.

Human Resources Policies Review

One of our Corporate Strategic Objectives, as set out in the new Corporate Plan approved by the Joint Committee in March 2020, involves implementing a Human Resources strategy.

In order to deliver this strategic objective, the HR Policies were refreshed to ensure that they were fit for purpose and the refresh supports our ability to implement the new Corporate Plan.

HeadsTogether Consulting Limited undertook the review which involved updating/replacing existing policies, as well as introducing new policies. The review was completed in June.

It has been noted however that the decision to commission the work was not recorded in the list of decisions presented to the Joint Committee at its meeting on 30 July 2020.

The Joint Committee is therefore asked to provide retrospective approval for the review of the Human Resources policies work that was undertaken.

The Joint Committee is also asked to approve that the record of decisions, made under the Delegated Authority of the Acting Chief Executive, be updated to take this decision into account.



Item 15 - Consultations

Item 15.1 - Code of Conduct for Local Government Employees - Consultation

For approval

The Local Government Staff Commission is responsible for the maintenance of the Code of Conduct for Local Government Employees which makes provision for the conduct and standards that all Local Government staff are expected to adhere to.

The Code of Conduct is being updated and a consultation is underway seeking views of consultees.

The Staff Commission has taken into account, in the proposed amendments, developments in best practice, examples of similar Codes of Conduct in other public sector bodies and issues that Councils have encountered in operating the current code.

Members of the Joint Committee are invited to comment on the proposed response so that their views are taken into account in the final submission.

The Joint Committee is asked to approve the draft consultation response, subject to any final comments received from Members.

Item 15.2 - UK Internal Market White Paper - Consultation

For approval

The Secretary of State for Business, Energy and Industrial Strategy (BEIS), the Right Honourable Alok Sharma MP, published a White Paper on the UK Internal Market on 16 July 2020 and has issued the documents for consultation, with a deadline of 13 August 2020.

The consultation seeks the views of a wide range of organisations on the policy options through proposals to enshrine in law two principles to protect, post transition, the flow of goods and services in the UK's Internal Market: the principle of mutual recognition, and the principle of non- discrimination.

The Joint Committee is provided with the proposed arc21 response to the consultation and is asked to consider and provide retrospective approval.

Item 15.3 - Plastic Packaging Tax Policy Design – Consultation**For approval**

This is a new tax that applies to plastic packaging produced in, or imported into the UK that does not contain at least 30% recycled plastic. Plastic packaging is packaging that is predominantly plastic by weight.

It will not apply to any plastic packaging which contains at least 30% recycled plastic, or any packaging which is not predominantly plastic by weight.

A response has been submitted by the deadline of 20 August and the Joint Committee is asked to consider and provide retrospective approval accordingly.

Item 16 - Future Recycling and Collection of Waste of a Household Nature in Northern Ireland**For noting**

The Joint Committee will be provided with a verbal report and presentation on this consultation.

Item 17 - AOB**Item 18 - Next Meeting Thursday 24 September 2020**

ITEM 3
ARC21 JOINT COMMITTEE
Meeting No 048
Virtual Meeting
MINUTES
Thursday 30 July 2020

Members Present:

Councillor M Goodman
 Alderman A Carson
 Councillor G Walker
 Councillor P McReynolds
 Councillor F Ferguson
 Councillor M Gregg
 Councillor S Lee
 Councillor M Burnside
 Councillor H McKee
 Councillor K Owen
 Councillor W Clarke (*Deputy Chair*)

Antrim and Newtownabbey Borough Council
 Ards & North Down Borough Council
 Ards & North Down Borough Council
 Belfast City Council
 Belfast City Council
 Lisburn & Castlereagh City Council
 Lisburn & Castlereagh City Council
 Mid & East Antrim Borough Council
 Newry, Mourne & Down District Council
 Newry, Mourne & Down District Council
 Newry, Mourne & Down District Council

Members' Apologies:

Councillor N Kelly
 Councillor T McGrann
 Alderman R Gibson (*Chair*)
 Councillor JJ Magee
 Alderman D Drysdale
 Councillor I Friary
 Alderman R Cherry

Antrim & Newtownabbey Borough Council
 Antrim & Newtownabbey Borough Council
 Ards & North Down Borough Council
 Belfast City Council
 Lisburn & Castlereagh City Council
 Mid & East Antrim Borough Council
 Mid & East Antrim Borough Council

Officers Present:

T Walker
 G Craig (*Secretary*)
 H Campbell
 J Green
 K Boal
 L Daly
 D Lindsay
 B Murray
 N O'Malley
 D Carey
 R Moore

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 Antrim and Newtownabbey Borough Council
 Ards & North Down Borough Council
 Belfast City Council
 Lisburn & Castlereagh Borough Council
 Mid & East Antrim Borough Council
 Newry, Mourne & Down District Council

Officers' Apologies:

G Girvan
 N Grimshaw
 S Toland
 H Moore
 P Thompson

Antrim & Newtownabbey Borough Council
 Belfast City Council
 Belfast City Council
 Lisburn & Castlereagh Borough Council
 Mid & East Antrim Borough Council

In the absence of the Chair, Alderman Gibson, the Deputy Chair, Councillor Clarke took the Chair. He informed the Committee that Alderman Gibson was unwell and on behalf of the Joint Committee wished him a speedy recovery.

As this was the first remote video meeting of the Joint Committee Mr Craig read out the protocol for conducting the meeting.

The Chair welcomed all Members and Officers accordingly.

Item 1 - Conflicts of Interest Statement

The Chair read out the Conflicts of Interest Statement. There were no conflicts noted.

Action: Noted

Item 2 - Apologies

Apologies were noted.

Action: Noted

The Chair advised Members that the meeting would now go "*in committee*", which was proposed and seconded accordingly.

IN COMMITTEE

Matters of a confidential and commercially sensitive nature were discussed under these agenda items.

Following discussion on the commercially sensitive matters, the Chair advised Members that the meeting would now return to the main agenda but whilst "*in committee*" there was one matter discussed as follows:

Item 3 - Governance Arrangements Update

Action: Agreed

OUT OF COMMITTEE

The Chair advised members that the meeting would now return to the main agenda, which was agreed.

Item 4 - Minutes

The minutes of the Joint Committee meeting 047 held on 27 February 2020 were agreed.

Action: Agreed

Item 5 - Matters Arising from the minutes of meeting 47

Page 15-Site Visits to Contractor Facilities - Ms Boal advised that, due to the covid emergency, site visits were presently on hold as no visitors were allowed at the facilities. It was unlikely therefore that visits could be arranged until next year but this will obviously be dependent on the situation at the time.

Action: Noted

Page 16-Deposit Returns Schemes (DRS) Meeting Group - Mr Walker advised that the DRS meeting group had continued during lockdown with representatives from all over the UK. He reported that it was likely that two consultations would be coming out probably late December or early January and he would keep Members updated on these accordingly.

Action: Mr Walker

Page 17-Scenario Planning Workshop - Mr Walker advised that this was on hold at present as councils gather viewpoints for next steps in relation to the development of the Waste Management Plan.

Action: Noted

Page 17-Attendance of Members - following the concerns raised regarding Member attendance at Joint Committee meetings and the issue of having a quorum, Mr Walker advised that, as part of the next Annual Report for 2019/20, a record of the percentage of Members in attendance would be included. Members raised their concerns with council meetings being held at the same time as Joint Committee meetings, work commitments and the time travelling to and from the meetings. It was suggested that Mr Walker speak to the CEXs to see if this was something that could be considered when councils are arranging their meetings. It was also noted that remote video meetings, such as the one held on this occasion, would result in better attendance.

Action: Mr Walker

The online remote virtual type meeting was discussed, the general consensus was positive and it was agreed to hold the meetings in this format going forward for the near future and to keep this under review. This would have the benefit of cost savings and reducing travelling time and hopefully those in the past having difficulties in attending may find it easier to attend the meetings under this new format.

The platform type was discussed and whether it should be ZOOM or MS Teams. Mr Walker advised that arc21's service provider was Belfast City Council and they would only support MS Teams due to the security and encryption features that the platform presents.

Action: Agreed

Item 6 - Notes of Joint Committee Briefing 04 held in June 2020

The notes of the June briefing, number 04, held between the Acting Chief Executive and the Chair were presented for noting.

Following discussion the Joint Committee agreed to note accordingly.

Action: Noted

The Chair advised Members that the meeting would now go "*in committee*", which was proposed and seconded accordingly.

IN COMMITTEE

Matters of a confidential and commercially sensitive nature were discussed under these agenda items.

Following discussion on the commercially sensitive matters, the Chair advised Members that the meeting would now return to the main agenda but whilst "*in committee*" there were five matters discussed as follows:

Item 7 - Minutes of Joint Committee Meeting 047 held on 27 February 2020 'in committee' **Action: Agreed**

Item 8 - Matters Arising **Action: Noted**

Item 9 - Notes of Joint Committee Briefing 04 held in June 2020 **... Action: Noted**

Item 10 - Residual Waste Treatment Project Action: Agreed

Item 11 - Commercially Sensitive Procurement and Contracts Issues Action: Agreed

OUT OF COMMITTEE

The Chair advised Members that the meeting would now return to the main agenda, which was agreed.

Item 12 - Contracts and Performance Update

Ms Boal presented a report to advise the Joint Committee on the prevailing monthly situation pertinent to the operational performance of the service and supply contracts.

She reported that arc21 continues to manage and monitor the impact of COVID-19 on its contracts and operationally the contracts continue to perform effectively with some ongoing issues regarding processing and market availability in relation to the Bring Bank Textile contract.

She noted that new contracts for Municipal Waste Disposal had been approved and steps were far advanced to commence those contracts with an effective start date from 1 August 2020.

She reported that the education service was currently suspended and the education officer was covering the duties of the monitoring officer who was off on maternity leave.

In covering the ongoing work, the Chair noted his thanks for the work by arc21 officers in helping and supporting Councils by maintaining continuity of service throughout the difficult circumstances recently experienced. He also thanked the Council Officers and Directors for continuing to deliver the waste services during this difficult time.

Following discussion the Joint Committee agreed to note the report.

Action: Noted

Item 13 - Council Covid-19 Waste Management Financial losses

Mr Craig presented a report to update the Joint Committee on the Waste Management Financial support sought from Government in regards to the losses being incurred by councils arising from the Covid-19 emergency.

He advised that meetings were ongoing with DAERA Officials to ensure that the Department is kept up to date with the issues impacting local government in terms of waste management from a financial point of view.

He reported that claims had been submitted in respect of the estimated losses incurred by the 11 councils from mid-March to June and reported that the estimated losses for the next quarter (Jul-Sept) have also been submitted to the Department.

He noted that the overall total estimates losses incurred by councils on waste management activities from March to September is £10M.

Following discussion the Joint Committee agreed to note the report.

Action: Noted

Item 14 - Audit Committee Meeting 27 July 2020

Mr Craig presented a report to update the Joint Committee on the issues presented to the Audit Committee at the meeting which had been held on 27 July 2020.

He reported that the main issue for the Audit Committee related to the statutory draft accounts for the year to March 2020. He reported that the Audit Committee had approved the draft accounts for submission to the Department and the Local Government Auditor, and that the audit was now underway. He stated that he would present the draft accounts to the next Joint Committee meeting.

Following discussion the Joint Committee agreed to note the report.

Action: Noted

Item 15 - Department of Agriculture, Environment & Rural Affairs (DAERA) Public Discussion Document: Collection of Waste of a Household Nature in Northern Ireland (NI)

Mr Walker presented a report to advise the Joint Committee on a public discussion document originating from DAERA on the Collection of Waste of a Household Nature in NI.

He reported that DAERA is seeking views on a public discussion document on the "*Future Recycling and Separation of Waste of a Household Nature in Northern Ireland*". The document sets out the current position of recycling in NI, and the current and new regulatory, climate change and market drivers that will influence policy in the future. It seeks views on a range of proposals, which will help shape the landscape of waste management in Northern Ireland.

He reported that NILGA were proposing to hold a workshop on Thursday 27 August which Members and Officers may wish to attend. As this coincides with the next Joint Committee meeting, Members were asked to advise arc21 (and NILGA) if they would-be interested in attending the workshop. If so the Joint Committee meeting scheduled for that morning could be rescheduled accordingly.

Following discussion the Joint Committee agreed to note the report.

Action: Noted

Item 16 - AOB

Abbreviations / acronyms in papers - issues were raised regarding the number of abbreviations and acronyms used in the reports and it was agreed that going forward all reports containing abbreviations / acronyms would have an explanatory description provided..

Action: Mr Walker

Item 17 - Next Meeting

The Chair advised that the next scheduled meeting of the Joint Committee was due to be held on Thursday 27 August, subject to the NILGA workshop which was scheduled to take place on the same date. Accordingly the Joint Committee may be rescheduled and Members and Officers will be notified accordingly.

Action: Noted

Date: _____

Chairman: _____



HM Revenue
& Customs

146

Plastic Packaging Tax

Consultation response submission form

Publication date: 11 March 2020

Closing date for comments: 20 August 2020

Subject of this consultation:	The Plastic Packaging Tax which from April 2022 will apply to plastic packaging manufactured in or imported into the UK containing less than 30% recycled plastic.
Scope of this consultation:	At Budget 2020, the government announced key decisions it had taken for the design of Plastic Packaging Tax in light of stakeholder responses to the previous consultation in 2019. This document provides more information on these announced areas, as well as asking for views on areas of the tax design which have been further refined as we move closer to the implementation date.
Who should read this:	The government would like to hear from businesses, individuals, tax advisers, trade and professional bodies and other interested parties.
Duration:	11 March 2020 to 20 August 2020 (23 weeks).
Lead official:	Alex Marsh, HM Revenue and Customs.
How to respond or enquire about this consultation:	Responses or enquiries should be sent by 20 August 2020, by email to indirecttaxdesign.team@hmrc.gov.uk or by post to: Alex Marsh, 3rd Floor Ralli Quays, Stanley Street, M60 9LA.
Additional ways to be involved:	In order to engage with businesses and individuals who would be affected by the proposals in this consultation, the government will be consulting key stakeholders and interested parties on the proposals through meetings. If you would like to be included in a consultative meeting, please contact us via the email above.
After the consultation:	The government will aim to analyse responses and publish a formal responses document within 12 weeks after the end of the consultation period.
Getting to this stage:	The responses to the government's Call for Evidence on single-use plastic waste in 2018 highlighted that using recycled plastic is often more expensive than using new plastic. At Budget 2018, the government proposed to use a new tax to encourage the use of recycled plastic and has taken the responses from the first consultation, published in 2019, into consideration to develop the proposals presented here.
Previous engagement:	During the first consultation period, the government had meetings with various stakeholders to discuss the impact of the initial proposals. The government also conducted market research to improve understanding of the packaging industry.

Consultation

This response form is to be used for responding to HMRC's consultation on a Plastic Packaging Tax. The consultation in full can be found on the following link - <https://www.gov.uk/government/consultations/plastic-packaging-tax-policy-design>.

Confidentiality

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018, General Data Protection Regulation (GDPR) and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that under FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on HM Revenue and Customs.

Consultation privacy notice

This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the General Data Protection Regulation.

Your data

The data

We will process the following personal data:

Name
Email address
Postal address
Phone number
Job title

Purpose

The purpose for which we are processing your personal data is: The Plastic Packaging Tax Consultation.

Legal basis of processing

The legal basis for processing your personal data is that the processing is necessary for the exercise of a function of a government department.

Recipients

Your personal data will be shared by us with HM Treasury.

Retention

Your personal data will be kept by us for six years and will then be deleted.

Your rights

- You have the right to request information about how your personal data are processed, and to request a copy of that personal data.
- You have the right to request that any inaccuracies in your personal data are rectified without delay.
- You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.
- You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.
- You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113
casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

Contact details

The data controller for your personal data is HM Revenue and Customs. The contact details for the data controller are:

HMRC
100 Parliament Street
Westminster
London SW1A 2BQ

The contact details for HMRC's Data Protection Officer are:

The Data Protection Officer
HM Revenue and Customs
7th Floor, 10 South Colonnade
Canary Wharf, London E14 4PU
advice.dpa@hmrc.gsi.gov.uk

About you

Your name

Tim Walker

Your email address

arc21, Belfast Castle, Antrim Road, Belfast, BT15 5GR

Who are you submitting this response on behalf of? (Please only tick one)

☐ Business representative organisation/trade body

In the case of representative bodies please provide information on the number and nature of people you represent

☐ Packaging designer

☐ Packaging manufacturer / converter

☐ Product manufacturer / pack filler

☐ Distributor

☐ Online marketplace

☐ Fulfilment house operator

☐ Retailer

☐ Plastic packaging importer

☐ Plastic packaging exporter

☐ Waste Management Company

☐ Re-processor

☒ Local government

☐ Community group

☐ Non-governmental organisation

☐ Charity or social enterprise

☐ Consultancy

☐ Academic or research

☐ Individual

☐ Other

If you answered 'Other' above, please provide details

Please provide the name of the organisation/business you represent (if applicable)

arc21 - an NI local partnership made up of A&NBC, A&NDBC, BCC, LCCC, NM&DBC, MEABC

If you are in business, where is your business established?

- ☐ England
- ☐ Scotland
- ☒ Northern Ireland
- ☐ Wales
- ☐ Isle of Man
- ☐ Other EU - please state
- ☐ Non EU - please state

If you are in business, how many staff do you employ across the UK?

- ☐ Fewer than 10
- ☒ 10 - 49
- ☐ 50 - 249
- ☐ More than 249
- ☐ Prefer not to say

Are you an obligated packaging producer under Producer Responsibility (Packaging Waste) Regulations in the UK?

No

If you are a business that manufactures or imports plastic packaging, how many tonnes of plastic packaging do you manufacture or import annually?

N/A

Please provide any further information about your organisation or business activities that you think might help us put your answers in context.

Local Government Partnership serving 60% of households in NI

Would you like your response to be confidential? Why? (please note the information on confidentiality on page 3)

No

chargeable? If not, please explain why.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 5. Would the proposed exemption cause any market distortion or other unintended consequences? If yes, please provide more details.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Liability for the tax – chapter 4

Businesses who manufacture in the UK, or import plastic packaging into the UK will be liable to pay the tax, subject to relevant exemptions and the small operator threshold explained in chapter 5. This chapter outlines the government's proposals for when the tax will be chargeable and who the chargeable person will be.

Question 6. Do you agree the proposed charging conditions will ensure that the UK manufacturer of plastic packaging is liable for the tax? If not, please explain why.

☒ Yes

☐ No

☐ Don't know

This would appear to be the logical outworking of this proposed tax and should incentivise the inclusion of secondary materials into packaging (i.e. creating an economic pull which stimulated greater demand for and reuse of materials than that which would happen in the absence of a plastic tax)..

This is likely to have a bearing on the quantity/quality debate regarding the recycling and recovery of plastic materials as manufacturers may become more sensitive to different grades of secondary materials on the market, or may cause a differentiation in the nature of packaging as different grades of recycle end up being reused for different packaging purposes

Question 7. Do you foresee any issues for specific packaging components due to the proposed approach of disregarding further ancillary processes for the purposes of the tax? Please explain what these issues are.

☐ Yes

☐ No

☐ Don't know

No comment

Question 8. Do you have any observations on the proposed treatment of imports of plastic packaging, particularly linking the tax point to "first commercial exploitation" i.e. when it is controlled, moved, stored, is subject to an agreement to sell, or otherwise used in the UK in the course or furtherance of business?

No. This would appear to be a reasonable point at which to assess the tax implications arising from the packaging in use. As per 3 above, some policing or regulation of this may be required to monitor for/prevent fraud from the importation and onward sale of foreign packaged goods arising from Global Britain trade

Question 9. Do you agree the "consignee" on import documentation is likely to be the taxable person for imports of plastic packaging? In what scenarios might someone else be the person on

whose behalf the plastic packaging is commercially exploited?

☒ Yes

☐ No

☐ Don't know

As per Answer 8, this would appear logical.

Question 10. Do you agree that packaging that is damaged after the tax has become due should not be relieved? If not, please explain why you think this packaging should be relieved.

☐ Yes

☐ No

☐ Don't know

No comment

Question 11. Do you foresee any difficulty or added costs with the proposal for the taxable person to incorporate the amount of Plastic Packaging Tax onto the sales invoice, and if so, could this information be provided to customers in any other way?

☐ Yes

☐ No

☒ Don't know

But, in light of the sheer volume of packaging being consumed, steps which highlight the nature, recovery and reuse potential of packaging should be brought to the attention of customers in a manner which highlight the potential for Zero Waste, waste minimisation and the Circular Economy

Question 12. Are the proposals for joint and several liability reasonable? If not, please say why?

☐ Yes

☐ No

☐ Don't know

No comment

Question 13. Do you envisage any problems with extending joint and several liability to online marketplaces and fulfilment house operators who knew, or had reasonable grounds to suspect

that the tax had not been accounted for on sales made through their platform?

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 14. Will extending joint and several liability to third-party fulfilment house operators and online marketplaces be sufficient to deter overseas sellers from non-compliance with the tax? If not, what other steps should HMRC consider?

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Excluding small operators ('de minimis') – chapter 5

The government wants to ensure that the administrative burdens for businesses manufacturing and/or importing small amounts of plastic packaging, and the costs of administering and collecting the tax, are not disproportionate to the environmental harms the tax seeks to address. To achieve this, the government proposed in the previous consultation that only businesses over a minimum threshold, or a 'de minimis', would be in scope of the tax. This chapter sets out more detail on the government's de minimis proposals.

Question 15. Do you agree with the proposed guidance and tools to help business determine if they are above or below the de minimis? What other help could the government provide?

☒ Yes

☐ No

☐ Don't know

Yes, this seems reasonable but additional support to businesses could be provided through online support, such as chatbots

Question 16. Do you agree with the approach to record keeping for businesses below de minimis? If you disagree, please suggest what alternative approaches would be more appropriate and why.

☐ Yes

☐ No

☒ Don't know

Considerable weight has been placed by regulators upon local government making regular WasteDataFlow returns. It would appear unbalanced if a light-touch regime was introduced specifically for businesses, especially when there is much greater potential for packaging and packaging type materials to be reused in a Circular Economy.

In this context, the question may be how can businesses be supported in introducing and managing appropriate record keeping which could have the added benefit of demonstrating Duty of Care and minimising the risk of materials escaping the value chain and appearing in illegal waste operations

Question 17. Do you agree with the proposed forward and backward look test to apply the 10 tonne threshold? If you disagree, please suggest what would be more suitable and provide evidence to support your view.

☒ Yes

☐ No

☐ Don't know

This appears a realistic threshold and to be a logical approach but should be kept under review to monitor for abuse

Evidence requirements – chapter 6

This chapter sets out the government's updated proposals to help businesses fulfil their Plastic Packaging Tax obligations and safeguard the tax from avoidance and evasion.

Question 18. Do you agree with the government's proposal to restrict calculations of recycled plastic content to approved methods? If not, please explain why. What methods other than the proposed mass balance approach should be considered?

☒ Yes

☐ No

☐ Don't know

This appears to be a logical approach and limits the potential for alternative fraudulent methods emerging

Question 19. Where businesses are importing plastic packaging with at least 30% recycled content, will it be feasible for them to obtain the mass balance evidence from overseas manufacturers? What other ways could importers demonstrate the proportion of recycled plastic?

☐ Yes

☐ No

☐ Don't know

No comment

Question 20. Do you agree with the government's proposed method for calculating the weight of the packaging? If not, please explain why and how you would calculate it.

☒ Yes

☐ No

☐ Don't know

Seems like a reasonable approach

Question 21. Are the types of evidence within the government's list appropriate for proving recycled plastic content and the other information required by HMRC? Are there any additional sources of evidence which could be used? If so, please provide details.

☐ Yes

☐ No

☐ Don't know

Seems like a reasonable approach

Question 22. **What further due diligence could businesses reasonably conduct to ensure their products meet the relevant specifications for tonnage and recycled plastic?**

No comment

Exports – chapter 7

This chapter sets out the government’s updated approach for exports of plastic packaging. As set out in the government’s initial consultation, UK manufacturers will not be disadvantaged because exported plastic packaging will be relieved from the tax.

Question 23. Are there any observations or issues you can see with the government’s proposals to provide relief for exported plastic packaging through direct exports, REPs and tax credits? Please provide details of any alternative methods of relieving exports you would recommend.

No comment but the recent experience of PERNs needs to be considered to minimise the prospect of gaming the system

Question 24. Do you agree with the proposed information requirements to evidence the proposed export reliefs? If not, please explain how you could evidence the export.

- ☐ Yes
- ☐ No
- ☐ Don’t know
- No comment

Question 25. Do you agree with the proposal not to relieve transport packaging used on exports? If not, do you have any suggestions on how transport packaging could be offered relief?

- ☒ Yes
- ☐ No
- ☐ Don’t know
- Seems like a reasonable approach

Registrations, returns and enforcement – chapter 8

This chapter sets out the registration and returns requirements for the tax, and the compliance and enforcement regime HMRC will operate to ensure a level playing-field for all.

Question 26. Do you consider these registration requirements to be appropriate? If not, please specify why.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 27. Do you agree that the group eligibility criteria are appropriate? If not, please specify why.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 28. In your view, are businesses eligible to form a group likely to make use of this facility? If so, please estimate the value of savings that may be offered by registering and reporting as a group.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 29. Do you agree that these deregistration requirements are appropriate? If not, please specify why.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 30. In your view, will the reporting requirements be straightforward to comply with? If not, please provide details of any issues you expect.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Question 31. Do you intend to use a third-party agent to help meet your obligations for the tax or are you an agent expecting to provide this service? Would you expect their responsibilities to include filing your returns?

- ☐ Yes
- ☐ No
- ☐ Don't know
- N/A

Question 32. Please provide details of the expected costs to your business of registering for the tax, and any expected one-off and on-going costs of completing, filing and paying the return, excluding any expected tax liability.

N/A

Question 33. Do you consider that HMRC's approach to powers and penalties is appropriate? If not, please specify why.

- ☐ Yes
- ☐ No
- ☐ Don't know
- No comment

Understanding commercial practices – chapter 9

Question 34. Unless already covered in your responses to other questions within this document or the previous consultation, please tell us about the plastic packaging manufactured or imported by your business and how you think your business would be impacted by the tax, including additional administrative burdens?

N/A

But as local government we are concerned with the sheer volume of plastic film and light packaging which comprises a considerable volume of local authority collected municipal waste. As per the Everyday Plastics Survey mentioned in Answer 3, there appears to continue to be an ever increasing volume of these materials which have limited scope for recycling.

This needs to be addressed at policy level and for this reason this proposed tax is to be welcomed (is there scope for further fiscal interventions?) as without increasingly impactful interventions to improve recoverability and recyclability of products, achieving the Circular Economy target of 65% recycling by 2035 will be asymptotic

Assessment of impacts – chapter 10

Question 35. Do you have any comments on the assessment of equality and other impacts in the Tax Impact Assessment?

Broad agreement with the predicted economic impact and overall welcome the introduction of these measures to growing the potential secondary markets for a greater range of materials while also having the benefit of mitigating environmental impact

Submitting your response

Your response should be sent by 20 May 2020, by email to indirecttaxdesign.team@hmrc.gov.uk or by post to: Alex Marsh, 3rd Floor Ralli Quays, Stanley Street, M60 9LA.

Paper copies of this document or copies in Welsh and alternative formats (large print, audio and Braille) may be obtained free of charge from the above address. This document can also be accessed from [HMRC's GOV.UK pages](#). All responses will be acknowledged, but it will not be possible to give substantive replies to individual representations.

When responding please say if you are a business, individual or representative body. In the case of representative bodies please provide information on the number and nature of people you represent.

NEIGHBOURHOOD SERVICES COMMITTEE**HISTORIC ACTIONS TRACKING SHEET**

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NEIGHBOURHOOD SERVICES MEETING – 19 JUNE 2019					
NS/011/2019	Defective wall at Shímná River, Newcastle	Note the contents of the above report and, depending on the outcome of the Structural Engineer's Report, if there were emergency issues, that authority be given to officers to proceed quickly with the necessary works.	K Scullion	Report to be provided to NS Committee September 2020	N
NEIGHBOURHOOD SERVICES MEETING – 23 OCTOBER 2019					
NS/070/2019	Notice of Motion – Memory Gardens	Approve the Notice of Motion and that Officers identify two locations for Memorial Gardens in the district, one in each Health Trust area and Officers to develop designs for such locations to include plants, materials requirements and costs to establish and maintain Further report to be brought back to the December Meeting of the NS Committee	K Scullion	In Progress Currently seeking availability of sites within Heath Trust. Delayed due to current pandemic priorities.	N
NS/071/2019	Memorandum of Understanding Partnering Arrangements for the removal of snow and ice	Agreed to review the Agreement and Schedule of the Memorandum of Understanding	R Moore	Correspondence received on 20 May 2020 from DFI	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
	from Town Centre footways and pedestrian areas	<p>Partnering Arrangements for the Removal of Snow and Ice from Town Centre Footways and Pedestrian areas during prolonged winter weather and the Agreement would be extended for a further 12 months in accordance with the "Scope of the Agreement" Clause 3 and Appendix 1 as amended.</p> <p>Also agreed officials meet with representatives from Dfi to review the priority list of locations, with a view to adding towns/villages that had increased in population and other relevant factors and also to raise the provision of grit to local communities by Dfi, for spreading themselves, in extreme weather situations.</p>		<p>Southern Division agreeing MOU with NMDDC.</p> <p>Updated MOU presented to NS September 2020</p>	
NS/073/2019	Proposed Property Maintenance Policy and Strategy 2019 to 2023	Council's Facilities Management and Maintenance Department develop for agreement with the NS Committee a Property Maintenance Policy and Strategy for the Council to cover the term of this Council 2019 to 2023.	K Scullion	On hold as part of Neighbourhood Services Review.	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		If required to assist officers in the development of this Strategy, external support to be procured in accordance with Council Procurement Procedures.			
NS/075/2019	Household Recycling Centres (HRC) Update	<p>To further illustrate changes at the new HRC site at Downpatrick, a HRC competition to be promoted at all primary schools at Downpatrick.</p> <p>Photocalls to be arranged to further publicise initiatives e.g. Official Opening, changes in procedures of sites at Castlewellan and at Ballynahinch and commencement of Permit System.</p>	J Parkes/ J McBride	<p>All actions below have been delayed due to Covid- 19. Focus is on the recovery plan for HRC's</p> <p>Final recommendation concerning Phase 2 of HRC review to be presented to committee upon completion of re-opening plan</p> <p>Intent to extend to both Castlewellan and Ballynahinch areas,</p> <p>Meeting scheduled with Marketing Officers to agree Comms. Meeting</p>	<p>N</p> <p>N</p> <p>N</p>

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>Reference FAQ'S to be drawn up relating to Permit System and placed on Web-site.</p> <p>Investigation to be made through WRAP Capital Fund for grant-aid toward additional container capacity at selected sites.</p>		<p>scheduled for 15 Nov.</p> <p>Meeting complete further meeting required.</p> <p>Currently being developed to coincide with launch</p> <p>Currently underway/ Ongoing</p>	N
NEIGHBOURHOOD SERVICES MEETING – 22 JANUARY 2020					
NS/005/2020	Notice of Motion – Food Waste Collection	<p>Agreed to adopt the Notice of Motion that “this Council will maximise food waste collection contributing to our recycling targets and reduction of our carbon footprint by simplifying it's biodegradable bag delivery system to residents” and that officers undertake necessary research and report back to the NS Committee presenting options for consideration and approval.</p>	J Parkes/ JMcBride	A report on caddy bags/kitchen caddys and home composters will be tabled at the October NS Committee	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/112/2020	Evaluation of alternatives to use of Herbicides containing glyphosate for controlling weeds and invasive species on Council property	<p>It was agreed the following proposed amendments to the Officer's report: -</p> <p>To undertake a 12-month review with a target to phase out completely the use of use of herbicides containing glyphosate for controlling weeds and invasive species on Council property within 3 years.</p> <p>Officers prevent the use of herbicides containing glyphosate at Council play areas and use alternative methods only for these areas.</p> <p>Council write to the relevant Stormont Minister stating the Council's position on this issue and seeking the position of all Government Bodies in Northern Ireland.</p>	K Scullion	<p>To be undertaken at 12-month review period January 2021</p> <p>Actioned</p> <p>Complete – No response to date</p>	N
NEIGHBOURHOOD SERVICES MEETING 19 FEBRUARY 2020					
NS/121/2020	Draft Public Convenience Strategy	Agreed to note the content of the above report and recommend approval for the draft Public Toilet	K Scullion	Report to NS Committee September 2020	Y

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>Strategy as presented and approve the commencement of a 12-week public consultation on the recommendations from the draft Strategy.</p> <p>Also agreed a Rowallane DEA Councillors site visit be organised with relevant Council Officials to discuss public convenience provision in Saintfield and that a report be brought back to the Neighbourhood Services Committee for consideration.</p>		In progress	N
NS/126/2020	DAERA Waste Prevention Programme 2019 – Stopping Waste In Its Tracks	Agreed arc21 would be responding on behalf of the 6 Councils who are members and also that if Councillors had any additional comments they should advise Mr Moore/Mr McBride.	J McBride	Awaiting finalisation of Arc21 response	Y
NS/127/2020	Study visit to Dulkeek EFW Plant	Agreed to visit the Indaver Facility, Duleek, County Meath on Thursday 4 April 2020 and also agreed the proposed programme	J McBride	Postponed due to COVID-19	N
NS/129/2020	Historic Actions Tracking Sheet	Agreed an update report on proposed memory gardens would be brought back to the Neighbourhood Services Committee	K Scullion	In progress - Delayed due to current pandemic priorities	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NEIGHBOURHOOD SERVICES COMMITTEE MEETING 18 MARCH 2020					
NS/137/2020	Christmas Illuminations & Celebrations Group Meeting – 13 Feb 2020	Officers proceed to issue an Expression of Interest to support a maximum of seven towns and villages to provide a recognised group with a planted sustainable Christmas Tree under the same terms as last year with the additional selection criteria referred to in Section 2 of this report, for the event that more than seven eligible applications are received. The programme to be delivered over a maximum eighteen-month period.	J Hillen	To be issued August 2020	N
		-Officers proceed to procure the required sustainable Christmas trees and supporting infrastructure to support this programme.	K Scullion	In progress	N
NS/139/2020	Presentation Re: Green Fleet	It was agreed to note this item be deferred.	J McBride	Report approved at the June 2020 Committee meeting. Specification currently being drawn-up to support a	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
				procurement exercise.	
NEIGHBOURHOOD SERVICES COMMITTEE MEETING 17 JUNE 2020					
NS/157/2020	Notice of Motion Re: Changing Places (CP) Toilets (Cllr McMurray)	Agreed to note the Notice of Motion and the proposed action for each respective element as detailed within section 2.2 of the report dated 17 June 2020	K Scullion	In Progress	N
NS/158/2020	Fleet Transition Strategy	Note the content of the report dated 17 June 2020 and agree to:- The recommendation to appoint suitable external technical expertise for the purposes of developing a fleet transition strategy, estimated at a cost of £30,000 - £40,000; and The recommendation to prioritise specific vehicle registration numbers (VRNs) on a case-by-case basis for replacement until the fleet transition strategy exercise has been completed	J McBride	Specification currently being drawn-up to support a procurement exercise	N
NS/166/2020	Business Case – Supply of PPE and staff uniforms for NS Directorate	Note the content of the report and associated Business Case and accept the conclusion of the business case that Option 3 was chosen as the preferred option.	K Scullion	In Progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		Option 3 would see a tender or tenders issued to appoint one or several suppliers to provide the NS Directorate and the AHC Community Engagement Department with all PPE and staff uniform requirements through dividing the requirements into relevant Lots. This would be for a one-year period but may be extended by a further two years.			
NS/167/2020	Business Case – Annual Servicing and Maintenance of Lifts in Council Buildings	Note the content of the report and associated Business Case and accept the conclusion of the Business Case that Option 3 was chosen as the preferred option. Option 3 would see the appointment, through a tender process, of a competent contractor to service, maintain and complete safety checks on all 32 No. lifts in the Council asset register. It would also see the appointment of a consultant to assist with auditing the performance of the successful contractor and quotations for repairs outside the scope of the contract.	K Scullion	In Progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/168/2020	Business Case – Inspection, Testing and Maintenance of Councils Fire Alarm Systems	Note the content of the report and associated Business Case and accept the conclusion of the Business Case that Option 2 was chosen as the preferred option. Option 2 would see the appointment, through a tender process, of a competent contractor to inspect, test and maintain Council Fire Alarms throughout Council premises at recommended intervals ensuring Councils legal compliance.	K Scullion	In Progress	N
NS/169/2020	Business Case – Annual Servicing, Maintenance and Monitoring of Intruder Alarm Systems in Council Buildings	Note the content of the report and associated Business Case and accept the conclusion of the Business Case that Option 3 was chosen as the preferred option. Option 3 would see the appointment, through a tender process, of a competent contractor to service, maintain and monitor all 45 No. intruder alarm systems in the Council asset register.	K Scullion	In Progress	N
NS/171/2020	Bring Sites Review	Note the content of the report and agree to:- <ul style="list-style-type: none"> ▪ A reduction in the current number of bottle bank 	J McBride	Contractor to be engaged re removal of redundant sites	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
		<p>"bring sites" across the District. Future provision to be restricted to the twenty-two (22) sites set-out at Appendix I as circulated.</p> <ul style="list-style-type: none"> ▪ The use of the contractor for the future safety inspection and maintenance of "bring sites" at a cost per annum detailed in the report; and ▪ To authorise Officials to explore income generation opportunities attached to the disposal of the redundant stock of "bring sites" <p>It was also agreed that when removing the sites, that potential recycling options for Island Park, Newcastle be considered.</p>			
NS/172/2020	Business case – RCV's	Approve the business cases for the replacement of the six Refuse Collection Vehicles (RCVs) as circulated at Appendix II.	J McBride	Specification currently being drawn-up to support a procurement exercise	N
END					