



June 18th, 2024

Notice Of Meeting

You are requested to attend the Sustainability & Environment Committee meeting to be held on Wednesday, 19th June 2024 at 6:15 pm in Council Chamber, O'Hagan House, Monaghan Row.

Committee Membership 2024-2025

Councillor G Kearns **Chairperson**

Councillor C Enright **Deputy Chairperson**

Councillor T Andrews

Councillor J Brennan

Councillor P Campbell

Councillor K Feehan

Councillor D Finn

Councillor V Harte

Councillor J Jackson

Councillor M Larkin

Councillor O Magennis

Councillor H Reilly

Councillor M Ruane

Councillor D Taylor

Councillor H Young

Agenda

1.0 Apologies and Chairperson's Remarks

2.0 Declarations of Interest

3.0 Action Sheet of the Sustainability and Environment Committee Meeting held on 22 May 2024.

For Approval

 *Action Sheet - 22 May 2024 inc. historic actions.pdf*

Page 1

4.0 To Agree Start Times of Sustainability & Environment Committee Meetings, Working Group and Cleansing & Refuse Task Group 2024-25 Schedule

For Decision

 *S&E 2024-25 Meeting Schedule.pdf*

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For Consideration and/or Decision

5.0 S&E Directorate Business Plan (2024-25)

For Decision

 *SE Committee Report - Directorate Business Plan 19.06.24.pdf*

Page 21

 *Appendix 1 - SE Directorate Annual Assessment of Business Plan 2023-24.pdf*

Page 24

 *Appendix 2 Sustainability & Environment Business Plan 2024-25 Final.pdf*

Page 31

6.0 Irish Open Carparking Provision


For Decision

 *Irish Open - request for use of NMD lands 19.06.24.pdf*

Page 49

7.0 Provision of portable toilets for events

For Decision

 *7. SE Committee Report - Provision of Portable Toilets at Events 19.06.24.pdf*

Page 55


8.0 Report on Sustainable NI Membership annual subscription

For Decision

 *Sustainable NI Subscription 2024 2025 .pdf*

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 **Appendix 1 2022-23 Impact Report.pdf** **Page 62**

 **Appendix 2 SNI New Membership_Newry Mourne and Down DC.pdf** **Page 76**

9.0 Report on Keep NI Beautiful Membership annual subscription

For Decision

 **KNIB Support 2024 2025 .pdf** **Page 80**


 **App 1 - KNIB NMDLHLH Letter (1) 2425.pdf** **Page 83**

 **App 2 - KNIB LHLH Impact Card 2324.pdf** **Page 85**

10.0 Food Service Plan

For Decision

 **Food Service Plan 2024 25.pdf** **Page 86**

 **Appendix 1 - Food Service Plan Final 2024 25.pdf** **Page 88**

11.0 Update on the new safeguarding measures for XL Bully breed type dogs

For Decision

 **Update on the new safeguarding measures for XL Bully.pdf** **Page 141**

12.0 DAERA Consultation – ‘Rethinking our Resources’

For Decision

 **DAERA Consultation Rethinking Our Resources.pdf** **Page 146**

 **Annex 1 to NMDDC Response - Rethinking Our Resources.pdf** **Page 149**

 **Appendix 1 - NMDDC Response Rethinking Our Resources.pdf** **Page 162**

Items deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act (NI) 2014

13.0 Fleet Replacement Update

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

14.0 Business Case for EV Charging Infrastructure

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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 Installation of EV Chargers 19.06.24.pdf**

Not included

 **Appendix 1 - Business Case EV Chargers.pdf**

Not included

15.0 Business Cases for Servicing, Maintenance and Monitoring of Council's Fire & Intruder Alarm Systems

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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 Cases for Fire Intruder Alarm Call-out 16.06.24.pdf**

Not included

 **Appendix 1 Business Case Fire, Intruder Alarm & Call-Out.pdf**

Not included

16.0 Business Case for Consultancy Services for Waste Contracts

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

17.0 Business Case for HRC Waste Streams

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

 **Business Case for HRC Waste Streams (Cover Report) 19.06.24.pdf**

Not included

 **Appendix 1 - HRC Waste Streams - Full Economic Appraisal 19.06.24.pdf**

Not included

18.0 Single Tender Action

For Decision

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

 ***Single Tender Action.pdf***

Not included

 ***Appendix 1 STA Deep cleansing of paved surfaces 14 June 2024.pdf***

Not included

FOR NOTING Items deemed to be exempt under Part 1 of Schedule 6 of the Local Government Act (NI) 2014

19.0 Report and presentation from the Cleansing and Refuse Task Group on 22 May 2024

For Information

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

 ***Action Sheet from Cleansing and Refuse Task Group 22 May 2024.pdf***

Not included

 ***Cleansing & Refuse Task group Presentation 22.05.24.pdf***

Not included

20.0 Arc21: Joint Committee Members' Monthly Bulletin held on 30 May 2024 and In Committee Minutes of Thursday 25 April

For Information

This item is deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act Northern Ireland 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.

 ***ARC21 - JC087-30May24-Item5-JC InCommMinutes25April24.pdf***

Not included

 ***ARC 21 - JC087-30May24-JC MembersBulletin.pdf***

Not included

For Noting

21.0 Arc21 Joint Committee Meeting Minutes of Thursday 25 April 2024

For Information

 *ARC21 JC087-30May24-Item3-JC Minutes25April24.F.pdf*

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22.0 District Cleansing – Summer Season 2024 Preparations

For Information

 *District Cleansing summer season 2024 preparations.pdf*

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Invitees

Cllr Terry Andrews

Cllr Callum Bowsie

Fionnuala Branagh

Cllr Jim Brennan

Lorraine/Emma Burns/McParland

Cllr Pete Byrne

Mr Gerard Byrne

Cllr Philip Campbell

Cllr William Clarke

Cllr Laura Devlin

Ms Louise Dillon

Cllr Cadogan Enright

Cllr Killian Feehan

Cllr Doire Finn

Cllr Aoife Finnegan

Ms Joanne Fleming

Cllr Conor Galbraith

Cllr Mark Gibbons

Cllr Oonagh Hanlon

Cllr Glyn Hanna

Cllr Valerie Harte

Cllr Roisin Howell

Cllr Tierna Howie

Ms Catherine Hughes

Cllr Jonathan Jackson

Cllr Geraldine Kearns

Miss Veronica Keegan

Mrs Josephine Kelly

Mrs Sheila Kieran

Cllr Cathal King

Cllr Mickey Larkin

Cllr David Lee-Surginor

Cllr Alan Lewis

Cllr Oonagh Magennis

Mr Conor Mallon

Cllr Aidan Mathers

Cllr Declan McAteer

Cllr Leeanne McEvoy

Cllr Andrew McMurray

Maureen/Joanne Morgan/Johnston

Cllr Declan Murphy

Sinead Murphy

Cllr Kate Murphy
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Cllr Selina Murphy
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Cllr Siobhan O'Hare
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Mr Andy Patterson
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Cllr Aine Quinn
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Cllr Henry Reilly
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Cllr Michael Rice
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Cllr Michael Ruane
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Mr Conor Sage
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Cllr Gareth Sharvin
.....
Donna Starkey
.....
Nicola Stranney
.....
Sarah Taggart
.....
Cllr David Taylor
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Cllr Jarlath Tinnelly
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Cllr Jill Truesdale
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Mrs Marie Ward
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Cllr Helena Young
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SUSTAINABILITY AND ENVIRONMENT 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 COMMITTEE MEETING 26 JANUARY 2022					
NS/004/2022	Trade Waste and Caravan Refuse Collection Services	Agreed to approve the report and recommendations:- 1. Alternate Weekly Commercial Waste Collection Service Commercial refuse customers (shops and businesses) to be contacted and advised of the proposed move to an alternate weekly collection cycle of residual and dry recyclable waste, where this is achievable. Commercial customers, (not including Caravan Operators) to be provided with appropriate bins to facilitate this change, so there is no cost burden to customers as a result of this change.	S Murphy	In progress	N
NEIGHBOURHOOD SERVICES COMMITTEE MEETING 21 APRIL 2022					

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
NS/052/2022	Compost Week 2022	Note and approve the additional activities in 2.2 to highlight and promote the importance of recycling food waste. Note and approve the launch of an application process, with set criteria, to establish demand for deploying brown bins to residents of high rise buildings who were not previously provided with these.	S Trainor	In progress	N
NS/057/2022	Various issues concerning the Events Space Kilkeel	Note the contents of the report. Approve the Officers recommendation that the legal position of the Council regarding its maintenance of the events space. Kilkeel, is reviewed with a separate report to be provided to the Council once this has been considered further.	C Sage	In progress	N
NEIGHBOURHOOD SERVICES COMMITTEE MEETING 22 JUNE 2022					
NS/091/2022	Enforcement Improvement Plan Update	Agreed to note the content of this update report and to agree review of key actions from the Enforcement Improvement Plan to be incorporated into a timebound programme of work for 2022/23 and annually thereafter. Test case footpaths – small footpath leading to WIN – officers to examine this area for dog fouling.	S Trainor	In progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 18 OCTOBER 2022					
SE/143/2022	Notice of Motion – revenue from EV Charging Infrastructure	Agreed to endorse the recommendation made at the Strategic Finance Working Group Meeting of 16 June 2022 as set out in Section 2.2 of the report and that officers consider the most appropriate way forward in relation to identifying appropriate spaces that may be suitable for the proposal as outlined in the Notice of Motion	C Sage	In progress	N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE TUESDAY 22 FEBRUARY 2023					
SE/016/2023	Economic Appraisal for the appointment of a Metal Fabrication and Repair Contractor	Agreed to note the content of the report and associated Economic Appraisal and accept the conclusion of the Economic Appraisal that Option 4 be chosen as the preferred option. Option 4 would see the appointment, through a tender process, of a contractor to provide metal fabrication and repair services. In addition to this an independent Metallurgical and Mechanical Engineering Consultancy Service would be appointed to provide advice to Council Officers on the procurement and management of this service.	C Sage	In Progress	N
SE/018/2023	Business Case for the appointment of a contractor to undertake Legionella	Agreed to:- <ul style="list-style-type: none"> Note the content of the report. Accept the conclusion of the Business Case that Option 3 be chosen as the 	C Sage	In Progress	N

Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
	Control Measures on behalf of the Council	preferred option. Option 3 would see the appointment, through a tender process, of a competent contractor to undertake a number of duties under the Council's Legionella Management Plan for a three-year period.			
SE/019/2023	Business Case for the appointment of a contractor to undertake asbestos control measures on behalf of the Council	Agreed to:- <ul style="list-style-type: none">To note the content of the report.Accept the conclusion of the Business Case that Option 3 be chosen as the preferred option to the appointment, through a tender process, of a competent contractor to undertake a number of duties under the Council's Asbestos Management Plan for a three-year period.	C Sage	In Progress	N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 22 MARCH 2023					
SE/035/2023	Removal of Bring Bank sites	Agreed to approve the removal of bottle bank "Bring Back" provision at caravan sites as listed in Appendix 1.	S Trainor	Complete	Y

SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 17 OCTOBER 2023					
SE/105/2023	Notice of Motion – Clean Indoor Air	It was agreed to adopt the Notice of Motion subject to including that before proceeding with any works, that officers obtain costings for air filtration systems in Downshire Civic Centre and the new civic centre in Newry and report same back to the Sustainable and Environment Committee for consideration in due course.	C Sage	In Progress	N
SE/107/2023	Notice of Motion – Animal Welfare	It was agreed to remove the final sentence of the notice of motion. It was agreed to defer a decision on the Notice of Motion until the outcome of the legal process was known.	S Trainor	In Progress	N
SE/114/2023	Procurement of Deep Cleansing Services	It was agreed to procure Deep Cleansing Services as outlined in appendix 1 of the officer's report.	S Trainor	In Progress	N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 22 NOVEMBER 2023					
SE/125/2023	Report on Notice of Motion in relation to Livestock worrying	It was agreed that a meeting be organised with relevant partners to discuss a way forward to produce a publicity campaign highlighting the importance of ensuring dogs are kept under control in the Mourne Mountains	S Trainor	In Progress	N
SE/126/2023	Consultation response on creating a smokefree generation and tackling young vaping	It was agreed to approve the consultation response to the UK Government and devolved administrations consultation on creating a smokefree generation and tackling youth vaping in Appendix 1	S Trainor	Complete	Y

SE/128/2023	Upgrade to Town Centre CCTV and Council Facilities CCTV	It was agreed that members note the content of the report, and a business case be developed and brought to the committee with a number of options for a way forward for the proposed development of a new suite of digital CCTV systems for the Council's facilities	C Sage	In Progress	N
SE/129/2023	Summer Pitch Maintenance 2024-2026	The committee agreed to endorse the key pitch work principles and the commencement of the tender process for maintenance works as outlined in Section 2 of the report	A Mallon	Complete	Y
SE/135/2023	NFLA Membership	It was agreed to retain membership of the NFLA and to pay the current 2023/24 membership fees as outlined within the officer's report. It was also agreed to seek representation on the NFLA Steering Committee via Party Leaders and that as part of the Council's membership we look at the possibility of hosting an event.	C Sage	Complete	Y
SE/137/2023	Business case for the purchase of Forklift Truck	It was agreed to approve the business case for the purchase of a replacement forklift truck	C Sage	Superseded by SE/040/2024	Y
SE/141/2023	Sustainable Food Places Bridging the Gap Funding Application	It was agreed to note the recent support for the "Bridging the Gap" funding application. Committee would be advised on the outcome of the application at the earliest opportunity	C Sage	In Progress	N

SE/142/2023	Biodiversity Strategy	It was agreed to note the draft Biodiversity Strategy and Action Plan, along with the attached consultation questions, and the proposed public consultation. Members to provide any further feedback through NMD Speak Service or besustainable@nmandd.org	S Murphy	Noted	Y
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 20 DECEMBER 2023					
ITEMS RESTRICTED IN ACCORDANCE WITH PART 1 OF SCHEDULE 6 OF THE LOCAL GOVERNMENT ACT (NI) 2014					
SE/147/2023	Business case for renewal of service contract for supply of Wood Pellets to Greenbank Council Depot, Newry.	It was agreed to note the contents of the report and to approve the business case for the supply of wood pellets for the Greenbank Depot biomass boiler for a 5-year period.	G Kane	Complete	Y
SE/148/2023	Review of Public Convenience opening/closing times	It was agreed to note the contents of the report and approve the opening/closing times contained within Appendix 1 of the officer's report, based on the review of the cleansing review and liaison with Council's HR department to ensure consideration of aspects contained within point 2.4 of the officer's report.	G Kane	Complete	Y
FOR NOTING – These items are deemed to be exempt under paragraph 3 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014					

SE/154/2023	Update on rebranding/ redevelopment of Newry Market	It was agreed to note the contents of the report.	C Sage	Noted Report to be brought to future meeting	N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 24 JANUARY 2024					
Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
SE/004/2024	Report on Notice of Motion – Flood Defences	<p>The following was agreed:</p> <ul style="list-style-type: none"> - Further investigate the possibility of a Shared Island application to assist with flood defences - Write to DFI Rivers and request a river maintenance schedule. - Seel legal advice to clarify if a meeting with DFI Rivers and the Drainage & Flooding Council would compromise the ongoing independent review of the recent flooding in the district. 	S Murphy	In Progress	N
SE/005/2024	Report on Notice of Motion – Flood Preparedness	<p>The following was agreed:</p> <ul style="list-style-type: none"> - Liaise with local DEA forums to discuss and plan the set-up of Community Resilience Groups - Investigate the facilitation of sandbag availability and management through these Community Resilience Groups - Look into sharing information the website from the Regional Community Resilience Group 	S Murphy	<p>Complete</p> <p>In Progress</p> <p>In Progress</p>	N

SE/006/2024	Business Case for firefighting equipment contract	It was agreed to note the content of the report and associated business case, and to accept the conclusion of the attached Business Case	C Sage	In Progress	N
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 21 FEBRUARY 2024					
Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N

SE/018/2024	Report on Notice of Motion – Climate Change	<p>It was agreed that this Council acknowledges the work done to date to help address the climate emergency; reaffirms previous motions regarding the degenerating global situation; and again, reiterates that the crisis is the biggest threat posed to our constituents, our district, and our planet.</p> <p>Further acknowledges, however, that recent data collated by Climate Emergency UK ranks NMDDC 8th out of the 11 Councils within NI; and thus, pledges to include ambitious targets in the forthcoming Sustainability and Climate Strategies and Action Plans to expedite implementation.</p> <p>It was also agreed that a benchmark report would be brought back to Committee regarding Council actions and progress to mitigating climate change impact.</p>	C Sage	In progress	N
SE/021/2024	Home to Hospital Schemes	<p>It was agreed to approve the continued funding for the Mourne and Slieve Gullion Home to Hospital Volunteer driver schemes from 1 April 2024.</p> <p>It was also agreed that Council seek Expressions of Interest from suitable Community/Voluntary sector organisations to administer the schemes, subject to funding being identified</p>	S Trainor S Trainor	In progress In Progress	N N

SE/025/2024	Business Case for Minor Construction Works	It was to accept the conclusion of the Business Case to proceed with option 3 to appoint 2 minor construction works contractor to complete minor works across the Council for 3-year period. To be procured through tender or use of a suitable Framework	C Sage	In Progress	N
SE/026/2024	Business Case for upgrade to fuel pumps and vehicle wash at Greenbank depot	It was agreed to approve the recommendations contained within the business case.	C Sage	Complete	Y
SE/028/2024	STA for additional repairs to Christmas Illuminations	It was agreed to approve a second STA to cover all outstanding costs associated with Christmas Illuminations 2023	C Sage	Complete	Y
SE/029/2024	Recycling of Paper at Household Recycling Centres	It was agreed that Council avail of the Bring Bank Servicing Contract – Lot 3: Mixed paper via arc21 at Downpatrick, Newry, Warrenpoint, Killeel, Camlough, Crossmaglen and Newtownhamilton HRCs from 1 April 2024.	S Murphy	Complete	Y
SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 20 MARCH 2024					
Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N

SE/036/2024	Former landfill site review – Aughnagun and Drumanakelly	It was agreed that officers develop a Business Case for the installation of Solar Panels at the former landfill site Aughnagun for further consideration.	S Murphy	In Progress	N
		It was agreed that Council further explore the benefits of installing reed beds at both sites in order to make the sites self-sustaining in terms of the management of the leachate generated on site	S Murphy		
SE/037/2024	Business Case for Mini-Tractor at Castlewellan Forest Park	It was agreed to note the contents of the report and associated business case, and to accept the conclusion of the business case to proceed with the procurement of effective replacement machinery.	C Sage	In Progress	N
SE/040/2024	Electric forklifts	It was agreed to note that in line with Council's Climate Change Emergency Declaration and environmental objectives, Council officers will progress with the procurement of a battery powered forklift truck.	C Sage	In Progress	N

SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 23 APRIL 2024					
Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
SE/046/2024	Notice of Motion – Newry Market	Officers continue their commitment to revitalise the market through engagement with traders, the business community and other potential stakeholders. It was also agreed that Officers reach out to other local councils with successful	S Murphy S Murphy	In progress	N

		markets and explore additional uses to encourage footfall, including with arts and community groups It was further agreed that a report be brought back to committee in 6 months to provide detail of any progress made	C Sage		
SE/04/7/2024	Review of Caravan Site License Conditions	It was agreed to approve a review of Council's Caravan Site Licence conditions for Residential Caravan Sites and Holiday and Touring Caravan Sites It was also agreed to revisit the motorhome strategy in partnership with all relevant Directorates, alongside addressing any relevant by-laws to ensure a strategy could be developed that suited the needs of the motorhome community and the local population.	S Trainor	In progress	N
			S Trainor	In progress	N
SE/04/8/2024	Christmas Illuminations 2024-2026	It was agreed to note the content of the report and business case. It was agreed to approve Option 3 of the Business Case to tender for a competent electrical contractor	C Sage C Sage	 In Progress	 N
SE/05/1/2024	STA – Waste Management	It was agreed to approve the extension of the STA for collection, treatment and processing of residual waste, rigid plastics and mixed paper from Downpatrick, Ballynahinch and Castlewellan Recycling Centres as outlined in the Officer's Report.	S Murphy	Complete	Y

SUSTAINABILITY AND ENVIRONMENT COMMITTEE MEETING 22 MAY 2024					
Minute Ref	Subject	Decision	Lead Officer	Actions taken/ Progress to date	Remove from Action Sheet Y/N
SE/056/2024	Action sheet of meeting held 22.04.2024	It was agreed to note the action sheet	S Murphy	Noted	Y
SE/057/2024	Working Groups and Forums	The following was agreed: Sustainability and Environment Working Group to be held Quarterly prior to Sustainability and Environment Committee meetings, commencing in June 2024. Cleansing and Refuse Task Group meetings to be held in a hybrid format, quarterly prior to the Sustainability and Environment Committee meetings. It was further proposed that the Health Fora should meet every six months as a minimum, with other meetings convened if emerging issues regarding hospitals etc that require immediate action or response arise.	S Murphy	Agreed	Y
SE/058/2024	Report on Treatment of Invasive Species on Council Estate	It was agreed to note the content of the report and approve the use of herbicides containing glyphosate for controlling invasive species at Albert Basin outside of the current allocation for normal weed	C Sage	In Progress	N

SE/05/2024	Report on Sustainability & Environment Single Tender Action	control and the development of an Invasive Species Management Plan for the Council Estate.	S Murphy	Complete	Y
SE/06/2024	Business Case for the Occasional Hire of Hook Lift and Driver	it was agreed to approve the business case to procure a contract for the Occasional Hire of Hook Lift Vehicle and Driver.	S Murphy	In Progress	N
SE/06/2024	Waste Management – Contract Extensions	it was agreed to approve the extension of waste collection and processing contracts listed in Appendix 1 in line with the extension end date in the table and rate increases in line with CPI.	S Murphy	Completed	Y
SE/06/2024	Arc21 Joint Committee Members' Monthly Bulletin Held on 25 April 2024	to note the document.	S Murphy	Noted	Y
SE/06/2024	Arc21 Joint Committee Meeting In Committee Minutes of Thursday 29 February 2024	to note the document.	S Murphy	Noted	Y
SE/06/2024	Arc21 Joint Committee Meeting Minutes of Thursday 29 February 2024	to note the minutes.	S Murphy	Noted	Y

SE/065/2024	Report on Northern Ireland Environment Forum 2024	to note the Councillor's conference update.	S Murphy	Noted	Y
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Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	Sustainability and Environment Committee/Working Group & Cleansing & Refuse Task Group 2024-25 Schedule
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability and Environment
Contact Officer (Including Job Title):	Sinead Murphy, Director: Sustainability and Environment

For decision		X	For noting only	
1.0	Purpose and Background			
1.1	The purpose of this report is to seek Member agreement on the Sustainability and Environment Committee, Sustainability and Environment Working Group and Cleansing and Refuse Task Group schedule for 2024-25.			
2.0	Key Issues			
2.1	The proposed schedule of meetings of the Sustainability and Environment (S&E) Committee is outlined in Table 1 of Appendix 1.			
2.2	<p>At the May 2024, S&E Committee, members agreed that the Sustainability and Environment Working Group (SEWG) would be held quarterly prior to S&E Committee meetings, commencing in June 2024 and the Cleansing and Refuse Task Group (CRTG) meetings would be held in a hybrid format, also quarterly prior to S&E Committee meetings.</p> <p>To accommodate this, it is proposed that the S&E Committee meetings held following SEWG and CRTG meetings would start at 6.15pm. The schedules for these meetings are provided in Tables 2 and 3 of Appendix 1.</p>			
3.0	Recommendations			
	<p>Members are asked to approve:</p> <ul style="list-style-type: none"> • The 2024/25 schedule of meetings for Sustainability and Environment Committee, Sustainability and Environment Working Group and Cleansing and Refuse Task Group. • Start time of 6.15pm for S&E Committee meetings held following Sustainability and Environment Working Group and Cleansing and Refuse Task Group meetings 			
4.0	Resource implications			
4.1	There are no additional resource implications associated with this report.			
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>			

	<i>n/a</i> <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 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><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> <i>n/a</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 <input type="checkbox"/></p>
7.0	Appendices
	<ul style="list-style-type: none"> Appendix 1 – 2024/25 schedule of meetings for Sustainability and Environment Committee, Sustainability and Environment Working Group and Cleansing and Refuse Task Group.
8.0	Background Documents
	SE/057/2024 S&E Committee – Working Groups and Forums

APPENDIX 1

Table 1: Sustainability & Environment Committee Schedule of Meetings 2024-2025

Date	Time	Location
19 June 2024	6.15 pm	Boardroom, Monaghan Row, Newry
21 August 2024	6.15 pm	Boardroom, Monaghan Row, Newry
18 September 2024	6.15 pm	Boardroom, Monaghan Row, Newry
23 October 2024	6.00 pm	Boardroom, Monaghan Row, Newry
20 November 2024	6.15 pm	Boardroom, Monaghan Row, Newry
18 December 2024	6.15 pm	Boardroom, Monaghan Row, Newry
29 January 2025	6.00 pm	Boardroom, Monaghan Row, Newry
19 February 2025	6.15 pm	Boardroom, Monaghan Row, Newry
19 March 2025	6.15 pm	Boardroom, Monaghan Row, Newry
29 April 2025	6.00 pm	Boardroom, Monaghan Row, Newry
21 May 2025	6.15 pm	Boardroom, Monaghan Row, Newry

Table 2: Sustainability and Environment Working Group Schedule of Meetings 2024-2025

Date	Time	Location
19 June 2024	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
18 September 2024	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
18 December 2024	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
19 March 2025	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry

Table 3: Cleansing and Refuse Task Group Schedule of Meetings 2024-2025

Date	Time	Location
21 August 2024	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
20 November 2024	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
19 February 2025	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry
21 May 2025	5.00 pm – 6.00 pm	Boardroom, Monaghan Row, Newry

Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	Sustainability & Environment Directorate Business Plan
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability and Environment
Contact Officer (Including Job Title):	Conor Sage, Assistant Director: Sustainability Sinead Trainor, Assistant Director: Environment

For decision		X	For noting only	
1.0	Purpose and Background			
1.1	<p>Directorate Business Plans provide an overview of planned activity for the year ahead, and contribute to the delivery of the Community Plan, Corporate Plan and other key plans and strategies. They form an essential part of the Council's Business Planning and Performance Management Framework, which demonstrates how corporate objectives are cascaded across the organisation and provides assurance that they are being delivered.</p> <p>As Directorate Business Plans are directly aligned to the achievement of the Corporate Plan, they remain fairly high level, and do not necessarily capture the core, business as usual activity that is undertaken by individual departments. Alternatively, they provide an insight into the key, overarching objectives, supporting actions and measures of success for each Directorate in the year ahead, whilst setting the context for the development of departmental Service Plans which are operational in nature.</p>			
2.0	Key Issues			
2.1	<p>Assessment of Directorate Business Plans 2023-24</p> <p>In order to improve transparency and accountability, and facilitate a performance led approach to business planning, each Directorate has undertaken an assessment of their Business Plan 2023-24. These assessments provide an overview of the performance of each Directorate and have been used to influence the development of the 2024-25 Business Plans. This exercise is an important part of the Council's statutory responsibility to strengthen the way performance is monitored, reviewed and reported across the organisation.</p> <p>The assessment of the Sustainability and Environment Directorate Business Plan 2023-24 is attached at Appendix 1.</p>			
2.2	<p>Directorate Business Plans 2024-25</p> <p>Directorate Business Plans 2024-25 outline the key objectives, supporting actions and measures of success each Directorate will work towards, which are aligned to the strategic objectives within the draft Corporate Plan 2024-27. Directorate Business Plans 2024-25 are also now aligned to the new organisational structure following completion of the planning for the future process.</p> <p>The Sustainability and Environment Directorate Business Plan 2024-25 is attached at Appendix 2.</p>			

2.3	It should be noted that further improvements to the business planning process are underway across the Council, particularly in relation to cascading corporate objectives in a meaningful way to employees through the introduction and roll-out of Service Plans and People Perform Grow. This process seeks to improve the use of performance measures at all levels of the Business Planning and Performance Management Framework and create a clear 'line of sight' between the work of individuals, teams and departments, and how they contribute to the achievement of Directorate Business Plans and the Corporate Plan.
3.0	Recommendations
	Members are asked to consider and agree the: <ul style="list-style-type: none"> Assessment of the Sustainability and Environment Directorate Business Plan 2023-24 Sustainability and Environment Directorate Business Plan 2024-25
4.0	Resource implications
4.1	There are no financial resources implications within this report.
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><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> n/a</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 completed <input checked="" type="checkbox"/></p>
7.0	Appendices
	<ul style="list-style-type: none"> • Appendix 1 – Assessment of the Sustainability and Environment Directorate Business Plan 2023-24 • Appendix 2 – Sustainability and Environment Directorate Business Plan 2024-25
8.0	Background Documents
	<p>Directorate Business Plans 2023-24</p> <p>Assessments of Directorate Business Plans 2022-23</p>

Sustainability and Environment

Annual Assessment Business Plan 2023-24

Introduction

This report provides an overview of progress in delivering the Sustainability and Environment Business Plan 2023-24 across the following service areas:

Waste Management

- Refuse Collection & Disposal
- District Cleansing
- Fleet Management & Maintenance
- Recycling

Facilities Management and Maintenance




- Grounds Maintenance
- Buildings Maintenance
- Cemeteries & Public Conveniences
- Civic Centre Domestic Services (Receptions, Canteens, Caretakers/Security)

The delivery of the Sustainability and Environment Business Plan 2023-24 supports the achievement of the following corporate objectives, and performance has been tracked using the legend below.

Provide accessible, high quality and integrated services through continuous improvement




Enhance, protect and promote our environment



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



Directorate objectives, supporting actions and measures of success





Directorate Objectives	
Sustainability and Environment Transformation:	<ul style="list-style-type: none"> Develop and implement transformational change for the Directorate. Through this, successfully drive out the efficiencies and improvements that both Members and the public demand for the delivery of the Directorate key services.
Facilities Management and Maintenance:	<ul style="list-style-type: none"> To deliver on grounds and building maintenance reactive and planned maintenance programmes. Provide advice, support and guidance to all departments across the Council in the management of all Council assets. To manage and develop the Council's Public Toilet and Cemeteries Services.
Waste Management:	<ul style="list-style-type: none"> To both manage and continuously improve the delivery of key frontline (Refuse Collection, Cleansing, Enforcement and Household Recycling Centres) and support (Business Support, Waste Processing and Fleet) services both within the Directorate and across other Directorates.









Sustainability and Environment Transformation			
OBJECTIVE	ALIGNMENT WITH CORPORATE PLAN		
Implement policies and procedures and monitoring arrangements to ensure corporate legislative compliance in respect of key statutory obligations, including Equality, Disability, Rural Needs, Health & Safety, Employment and Procurement legislation	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Recruitment of Tier 3 posts	Q2		One AD in post and one appointed with effect from 1 st December 2023
Implementation of the Sustainability & Environment Procurement Action Plan	Q4		SIB engaged to support S&E with Procurement Action Plan. Additional resources to be secured to progress actions
Manage the actions arising from the Directorate Risk Register	Ongoing		Ongoing








Implementation of Planning for the Future	Q4		Implementation to Tier 3 completed. Further implementation required at Tier 4 and below. BSM temporarily recruited BSO recruitment in progress
Develop a Sustainability and Environment Strategy and Action Plans	Q4		In progress

Facilities Management and Maintenance			
OBJECTIVE Delivery of Facilities Management and Maintenance Services to meet Council needs	ALIGNMENT WITH CORPORATE PLAN		
	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Relocation of staff following sale of Monaghan Row to Health Trust	Q1		Completed
Implementation of a new Facilities Management & Maintenance structure	Q4		Completed in draft, subject to review and sign off by SMT
Continued implementation of the Cemeteries Extension Programme	Q4		Cemetery extension Contract at Monks Hill practically complete.
Development of a Cemeteries Strategy	Q4		In progress but not completed
Development and implementation of a programme of work for Public Conveniences	Q2		Business Case approved at S&E committee and tender issued for upgrade Newcastle replacement toilets
Agree a Property Maintenance policy and strategy	Q3		In progress but not completed
Implementation of CCTV Strategy across Council to include both public space CCTV and Council facilities CCTV systems	Q4		Business Case approved at committee for upgrade of town centre CCTV systems in Newry, Kilkeel & Warrenpoint. Town Centre CCTV systems in Legacy Down area and Council Facilities currently under review. CCTV Strategy to be progressed.
OBJECTIVE	ALIGNMENT WITH CORPORATE PLAN		
	Enhance, protect and promote our environment		

Manage Council Estate in a way which promotes sustainable development and climate change adaptation			
Action	Timescale	Status	Progress
Agree a Tree Strategy for all woodland areas managed by Council	Q2		Complete
Evaluate the ability of the Council to be a net exporter of electricity	Q4		In progress but not completed

Waste Management			
OBJECTIVE Consistently deliver reliable operational services	ALIGNMENT WITH CORPORATE PLAN		
	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Develop and agree a new Refuse Collection service model	Q4		Ongoing but delayed due to trade union dispute
Complete a Business case and outline specification for the procurement of vehicle technology for fleet and customer services	Q4		Ongoing
OBJECTIVE Deliver a Cleansing Service that meets the needs of the district	ALIGNMENT WITH CORPORATE PLAN		
	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Implementation of the new District Cleansing service model	Q4		Procurement ongoing for additional vehicles approved by Committee. Delay in implementation due to trade union dispute.
OBJECTIVE Review Fleet Services to ensure it meets Customer Demands into the future	ALIGNMENT WITH CORPORATE PLAN		
	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Continued implementation of the current Fleet Replacement Programme	Ongoing		Complete

Agree a new Fleet Replacement Programme including new capital funding and develop a green fleet transition plan	Q3		Replacement programme agreed and included in capital programme
Agree a new Fleet Management service model including a new Fleet Management structure, fleet technology & garage workshop review	Q4		In progress. New structure completed in draft, subject to review and sign off by SMT.
OBJECTIVE Review of Household Recycling Centre Services to ensure they meet Customer Demands into the future	ALIGNMENT WITH CORPORATE PLAN		
	Provide accessible, high quality and integrated services through continuous improvement		
Action	Timescale	Status	Progress
Agree a new Household Recycling Centre (HRC) service model	Q3		Model developed. Discussions ongoing with Trade Unions
Implementation of a new HRC service model	Q4		Discussions ongoing with Trade Unions
Implementation of a HRC Capital Improvement Programme	Q4		Ongoing
OBJECTIVE Work with communities and other statutory and non-statutory agencies to tackle environmental crime	ALIGNMENT WITH CORPORATE PLAN		
	Enhance, protect and promote our environment		
Action	Timescale	Status	Progress
Develop and agree a new Waste Management Strategy	Q4		Awaiting release of NI Strategy from DAERA
Continued implementation of the Enforcement Action Plan	Ongoing		Ongoing
Continue to work collaboratively with Louth County Council on cross border issues	Ongoing		Ongoing

Measures of Success				
Measure	Target	Actual	Status	Explanation
Percentage of household waste collected that is sent for recycling	50% by 2020	Q1-Q3		
		52.4%		
Amount of biodegradable municipal waste that is landfilled	No target set	957t		
Amount of Local Authority Collected Municipal Waste arisings	No target set	17,899t		
Reduction in black bin waste collected	No target set	7,998t		
Increase in mixed dry recyclables collected	No target set	4,573t		
Increase in brown bin waste collected	No target set	3,278t		
Reduction in general waste arisings at civic amenity sites	No target set	1,843t		
Level of street cleanliness across the district	65	-	-	No figure provided by KNIB

Sustainability & Environment Directorate

Annual Business Plan 2024-25



Comhairle Ceantair
an Iúir, Mhúrn
agus an Dúin
**Newry, Mourne
and Down**
District Council

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1.0 Introduction

1.1 The Sustainability & Environment Directorate is responsible for the provision of a number of technical services, both internally to other council departments and externally to rate payers across the district. The Directorate is responsible for the primary waste management functions of Refuse Collection and District Cleansing along with the operational support to enable these services to be delivered. In addition, the Directorate has responsibility for the management and maintenance of the main corporate buildings (civic centres and depots) the maintenance of other buildings and grounds owned by Council as well as the Environmental Health, Emergency Planning and Health & Safety function of Council.

1.2 The Sustainability & Environment Directorate is seen as one of the key transformation projects for the Council. The Council has agreed to further develop this Directorate, as within this Directorate sits many of the services which affect the general environment of the district, some requiring significant improvement, such as bin collection, street cleansing and public conveniences.

1.3 The core responsibilities of the Directorate are:

Environment

- **Resource Collection, Processing and Recycling**
- **District Cleansing**
- **Resource processing -procurement, contract and data management**
- **Education and Enforcement (including dog control)**
- **Environmental Health**
- **Internal Health & Wellbeing**
- **Safety, Health and Emergency Planning**

Sustainability

- **Sustainability and climate action**
- **Grounds and Buildings Maintenance**
- **Facilities Management**
 - **Car parking facilities and Harbours**
 - **Cemeteries, Public Conveniences and Markets**
- **Fleet Management and Maintenance**

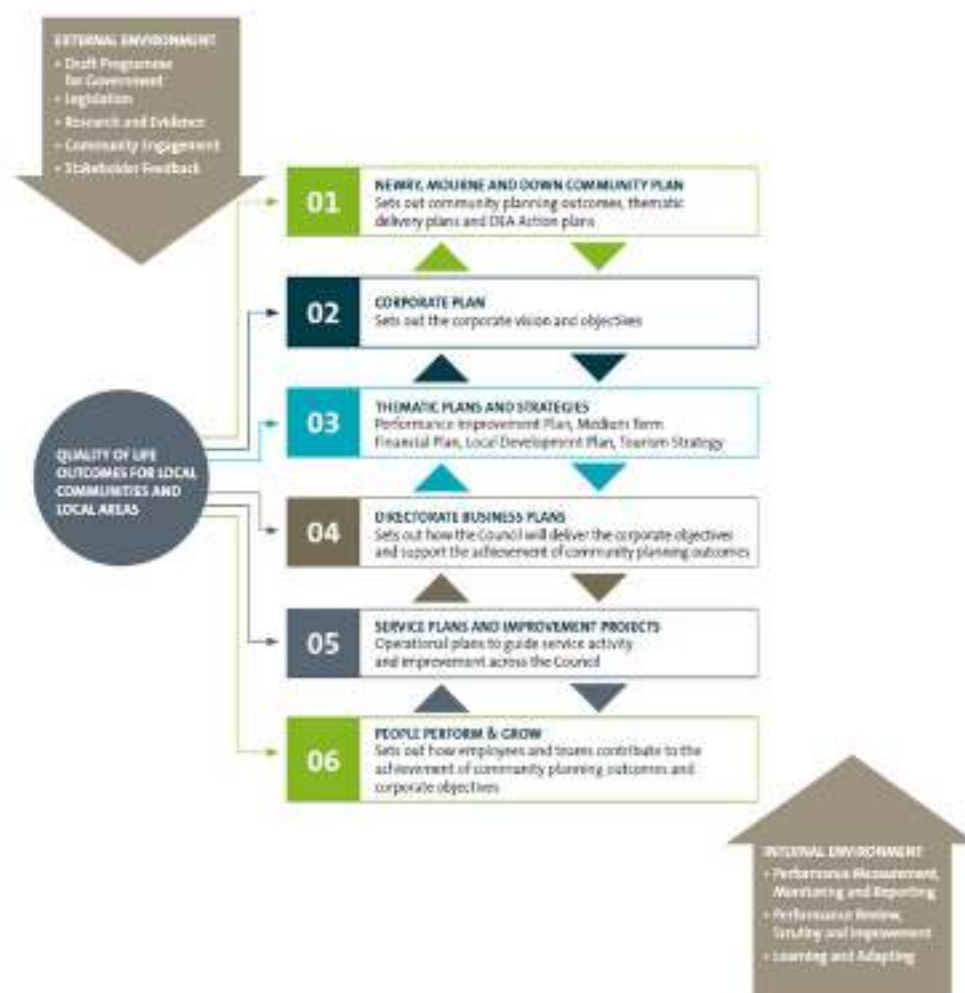
2.0 Background

2.1 The SE Business Plan is developed within the context of the Community Plan and draft Corporate Plan 2024-27. The Community Plan sets out the long-term outcomes for the district, based on the needs and aspirations of local people. The draft Corporate Plan sets out the key strategic objectives for the Council between

2024-27, and how it will contribute to achieving the community planning outcomes.

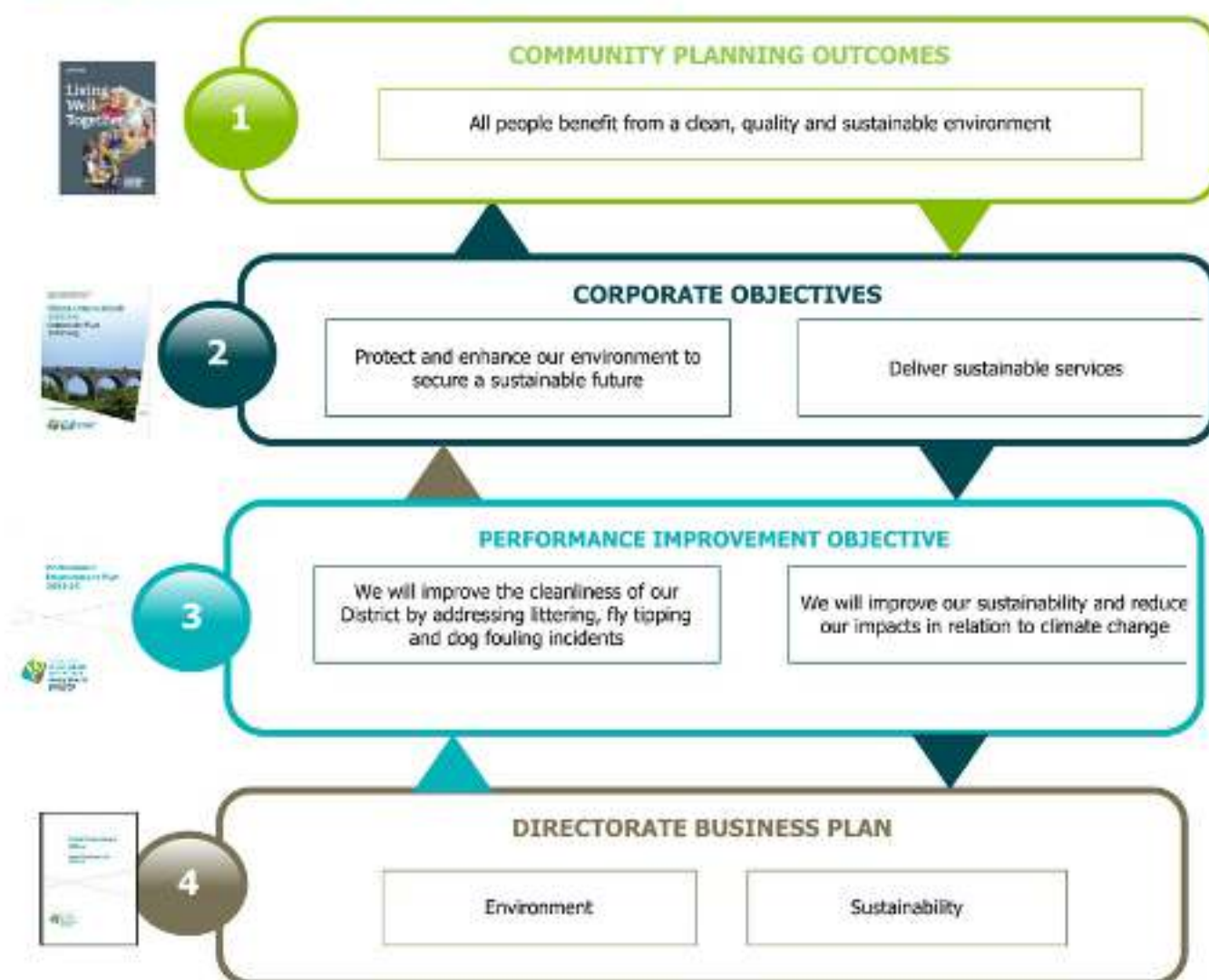
- 2.2 The Community Plan and Corporate Plan are cross cutting and strategic in nature. They guide all activity within the organisation, as well as the subsequent allocation of resources, and sit within a hierarchy of plans, as outlined in the 'Business Planning and Performance Management Framework' (Figure 1).
- 2.3 The Business Planning and Performance Management Framework drives and provides assurance that the Council is delivering its corporate vision and priorities, whilst securing continuous improvement in the exercise of functions. It provides a mechanism to join up and cascade the various plans and strategies across the organisation, demonstrating how employees contribute to achieving community planning outcomes and corporate priorities, for the ultimate benefit of the citizens we serve.

Figure 1: Business Planning and Performance Management Framework



- 2.4 Whilst the Corporate Plan focuses on issues which cut across the organisation and are strategic in nature, the SE Business Plan provides an overview of the key operational activities for the coming year. These activities are explicitly linked to corporate objectives and coupled with 'business as usual' service delivery, provide clear direction for all employees within the Directorate (Figure 2). Directorate Business Plans are supported by Service Plans and the 'People Perform and Grow' initiative.
- 2.5 The SE Business Plan is published annually and is the basis upon which performance is managed and reviewed by the full Council, Sustainability & Environment Committee and Senior Management Team.

Figure 2: Sustainability & Environment Alignment across the Business Planning and Performance Management Framework



3.0 Purpose & Values

3.1 Purpose

- 3.1.1 The primary purpose of the Sustainability & Environment Directorate is to develop, implement and monitor key corporate (strategic) frameworks to maintain and improve the environmental sustainability of the district through the appropriate management of waste and litter in the physical environment while also ensuring the management and maintenance of the council's estate across the district.

3.2 Values

- 3.2.1 The Department adheres to the Council's values which are outlined in the draft Corporate Plan 2024-27:

We will be:	Which means:
Respect	We will demonstrate respect for all people in our attitudes, behaviours and working relationships.
Transparency	We will be transparent in how we make decisions
Excellence	We will take pride in our work and be passionate about the standards we strive to achieve.
Integrity	We want the people of our district to trust us to do the right thing.
Accountability	We will be accountable to the public for our decisions and actions. We will be accountable for how we plan for and use resources sustainably.

- 3.2.2 In accordance with the Section 75 requirements of the Northern Ireland Act (1998), the Sustainability & Environment Directorate is committed to carrying out its functions having due regard to the need to promote equality of opportunity and regard for the desirability to promote good relations. All new and revised policies, procedures and programmes of work will be subject to an equality screening and rural needs impact assessment (where appropriate).

4.0 Challenges & Opportunities

- 4.1 The Sustainability & Environment Directorate, which was formally the Neighbourhood Services Directorate, was established in August 2022 following the implementation of 'Planning for the Future'. The organisational design of the new Council has therefore evolved, to centralise the management of several existing Council functions as well as new powers which were transferred to the Council on the 1 April 2015.
- 4.2 The various (internal and external) challenges and opportunities for the Directorate are summarised as follows:

External Environment

- **Legislation:** Ensuring corporate legislative compliance in respect of existing and new statutory obligations in Waste, including Zero Carbon, Health & Safety and Equality (Section 75).
- **Community Planning:** Via the Environmental and Spatial Thematic Delivery Group, developing partnerships and plans that will assist in the creation of local area-based plans to deliver on the Council's Community Plan.
- **Strategic Alliances:** Collaborating with a range of stakeholders to address the impact of Brexit and other emerging issues.
- **Global trends:** Take account of the impact on our working and natural environment from Covid-19 pandemic, climate change, Brexit and how this Directorate can rise to the challenges these issue present.

Internal Environment

- **Management:** Successfully establishing the new Directorate in terms of its structure, governance and internal processes.
- **Resources:** Identifying and securing the financial and non-financial resources needed for the Directorate to deliver the key frontline service for the Directorate.
- **Performance Management:** Continually monitoring and reviewing departments' performance, highlighting areas of high-performance as well as identifying areas for intervention.
- **Transformation & Improvement:** Developing and implementing transformational change for the new Sustainability & Environment Transformation Project. Through this, successfully develop and implement transformational change that drives out the efficiencies and improvements that both Members and the public demand.
- **Strategic Projects:** Ensuring the management and delivery of the Directorate's strategic projects within time, cost and quality parameters.
- **Property and Land Assets:** Successfully implementing centralised contracts and frameworks to support the effective and efficient management of the

council's estate.

- **Creating a Cleaner and Greener Environment:** Aligned with the best Circular Economy practices, implementing programs that will reduce waste arisings and litter, while increasing recycling and reuse.
- **Engagement:** Encouraging communities to take pride in their areas and support the Council by helping look after our environment through initiatives and campaigns.
- **Risk Management:** Managing potential risks and opportunities in achieving key actions outlined in the SE Business Plan by adhering to the Corporate Risk Management Policy and reviewing the SE Risk Register on a quarterly basis.
- **Compliance:** Establishing the necessary policies and procedures and monitoring arrangements to ensure corporate legislative compliance in respect of key statutory obligations, including Equality, Disability, Rural Needs, Health & Safety, Employment and Procurement legislation.
- **Information Technology:** Establishing robust information technology infrastructure to support business transformation.

5.0 Cross-Cutting Themes and Actions

There are a number of cross cutting actions aligned to the Community Planning Partnership priorities, Community Wealth Building and Sustainability and Climate Change that span across all Directorates and contribute to the fulfilment of Directorate Objectives, Corporate Objectives and ultimately Community Planning Outcomes.

Officers should indicate where their actions are contributing to the fulfilment of CPP, CWB or SCC actions by putting the relevant acronym in the column.

These actions should be identified in liaison with the relevant officers (CPP – Alan Beggs; CWB – Colin Moffett; SCC – Conor Sage) and relevant annual assessments of service plans forwarded to the above officers.

Acronym	Themes
CWB	Community Wealth Building
CPP	Community Planning Partnership priorities
SCC	Sustainability and Climate Change

Community Planning Partnership Priorities

While all actions will contribute to the delivery of the Community Plan, some actions may be considered appropriate to be contained within the Community Planning Partnership Priorities.

- Relevant priorities should:
- Align to the outcomes of the Community Plan
 - Involve collaborative working across statutory and community voluntary sector partners for both design and delivery.
 - Report through the Community Planning Structures
 - Measure and report impacts and outcomes

Community Wealth Building

Community Wealth Building is an approach to the way that economy's function, retaining more wealth and opportunity for the benefit of local people.

Key actions in relation to CWB should deliver on the 5 recommendations and sub-recommendations contained within the CLES/DTNI report – Newry, Mourne and Down pioneering the potential of community wealth building.

Sustainability and Climate Change

Sustainability and the climate change emergency continues to be a key driver of Council with the key objective of improving the lives and livelihoods of the people who live and work here. Approval to develop a Sustainability and Climate Change Strategy was agreed in June 2023.

6.0 Directorate Objectives and Supporting Actions

Directorate Objectives		
Sustainability and Environment Transformation: Embed and align the new functions and services within the S&E Directorate structure and across Council. Review and transform current operational models to deliver efficient, effective and sustainable services that continue to meet our statutory obligations.		
Sustainability: Develop and implement key sustainability strategies and action plans and advocate internally and externally to work towards net zero carbon through energy transformation, waste reduction, circular economy and green transportation programmes.		
Environment: Deliver sustainable services that protect our natural and built environment, continue to meet our statutory obligations and further improve the health and wellbeing of everyone in the District.		
Sustainability & Environment Transformation Supporting Actions		
Embed and align the new functions and services within the S&E Directorate structure and across Council. Review and transform current operational models to deliver efficient, effective and sustainable services that continue to meet our statutory obligations.	ALIGNMENT WITH CORPORATE PLAN	
	Deliver sustainable services Protect and enhance our environment to secure a sustainable future Represent the voice of the District with our Partners Develop and revitalise our District	
Action	Timescale	Cross-Cutting Theme
Progress the structure review of S&E Directorate including planning for the future.	Q3	
Progress recruitment of vacant posts and increase permanent Council employed staff in order to reduce reliance on agency staff.	Ongoing	CWB
Continue the implementation of the Procurement action plan	Ongoing	CWB
Continue to improve compliance with all relevant statutory obligations	Ongoing	
Managing the actions arising from the Directorate Risk Register.	Ongoing	
Conclude and implement review of Household Recycling Centre Services to ensure they meet Customer Demands into the future	Q4	
Conclude and initiate the implementation of the new District Cleansing service model	Q4	
Develop proposals for agreement for a new Refuse Collection service model		

Identify opportunities for digital transformation through review of service delivery	Ongoing	
Review Stress Audit actions, complete an updated staff Health and Wellbeing survey and, in collaboration with Human Resources, develop an action plan.	Q4	
Provide adequate emergency planning and response.	Ongoing	
Provide adequate health and safety and insurance provision	Ongoing	
Sustainability Supporting Actions		
Develop and implement key sustainability strategies and action plans and advocate internally and externally to work towards net zero carbon through energy transformation, waste reduction, circular economy and green transportation programmes.	ALIGNMENT WITH CORPORATE PLAN	
	Deliver sustainable services Protect and enhance our environment to secure a sustainable future Represent the voice of the District with our Partners Develop and revitalise our District	
Action	Timescale	Cross-Cutting Theme
Advocate Sustainability agenda internally and externally within Council.	Ongoing	
Develop and implement: <ul style="list-style-type: none"> • Climate Change and Sustainability Strategy • Climate Change Adaptation Plan • Biodiversity Strategy • Tree Strategy 	Q3	SCC
Continued implementation of the current Fleet Replacement Programme	Ongoing	
Commence decarbonisation of Council Fleet, including establishment of EV Infrastructure and fleet depot requirements and trials of alternative fuel vehicles.	Q4	SCC
Work with Stakeholders to implement Active Travel Masterplan	Q4	CPP
Continue the implementation of the Sustainable Food Places Programme	Ongoing	CPP/CWB
Develop and secure funding for a circular economy pilot project	Q4	SCC/CWB
Develop and agree a new Waste Management Strategy taking into consideration new legislative requirements and central government policy/guidance.	Q4	

Environment Supporting Actions		
Deliver sustainable services that protect our natural and built environment, continue to meet our statutory obligations and further improve the health and wellbeing of everyone in the District.	ALIGNMENT WITH CORPORATE PLAN	
	Deliver sustainable services Protect and enhance our environment to secure a sustainable future Improve the health and wellbeing of everyone in the district Empowering communities to play an active part in civic life	
Action	Timescale	Cross-Cutting Theme
Continue to deliver the Statutory Services of the functions within the Directorate	Ongoing	
Develop an Education, Awareness and Enforcement Improvement plan to address dog fouling, litter and fly tipping incidents across the District.	CPP	
Develop a strategy and action plan for the management and maintenance of Council facilities.	Q4	
Develop a strategy for CCTV across Council to include both public space CCTV and Council facilities CCTV systems	CPP	
Continue implementation of the Public Convenience Strategy	CPP	
Review and launch the Age Friendly Action Plan with partners	Q4	CPP
Work with community planning partners to improve community resilience planning	Q3	CPP
Support the development of Business continuity planning and emergency planning across Council	Ongoing	
Support the development of Health and Safety requirements across Council	Ongoing	

7.0 Performance

- 7.1 The Sustainability & Environment Directorate is responsible for key technical services, both internally to other council departments and externally to rate payers across the district. This exercise will also identify additional, suitable performance measures for the Sustainability & Environment Directorate.
- 7.2 In addition to managing and monitoring financial and human resources, the following performance measures will be monitored during 2024-25:

Measure of Success
Progress the structure review of S&E Directorate including planning for the future.
Number of compliant contracts completed in line with procurement action plan
Number of fully or partially implemented audit actions.
Number of statutory & funding returns completed on time.
Establish baseline customer satisfaction of the Household Recycling Centre Service users.
Complete the Health and wellbeing survey for staff and develop an action plan – Link with HR
Level of street cleanliness across the district (LEAMS)
Publication of strategies: <ul style="list-style-type: none"> • Climate Change and Sustainability Strategy • Climate Change Adaptation Plan • Biodiversity Strategy • Tree Strategy
Carbon Baseline established
Progress decarbonisation of Council fleet
Develop and agree a new Waste Management Strategy taking into consideration new legislative requirements and central government policy/guidance.
Review and launch the Age Friendly Action Plan with partners
Develop an Education, Awareness and Enforcement Improvement plan to address dog fouling, litter and fly tipping incidents across the District.

7.3 The SE Directorate is responsible for leading the development, implementation and review of the following plans and strategies, which influence the work of the Office and Council:

- Waste Management Plan
- SE Directorate Procurement Action Plan
- Public Toilet Strategy
- Tree Strategy
- Enforcement Improvement Plan
- Dog Fouling Strategy
- Local Biodiversity Action Plan
- Air Quality Management Action Plan
- Food Service Plan
- Climate Change Adaptation Plan
- Active Travel Masterplan

8.0 Organisation and Directorate Structure

The Sustainability & Environment Directorate is one of four Directorates, which together comprise the management structure of the Council (Figure 3). The management structure of the Sustainability & Environment Directorate contains two core frontline services and is outlined in the structure below;



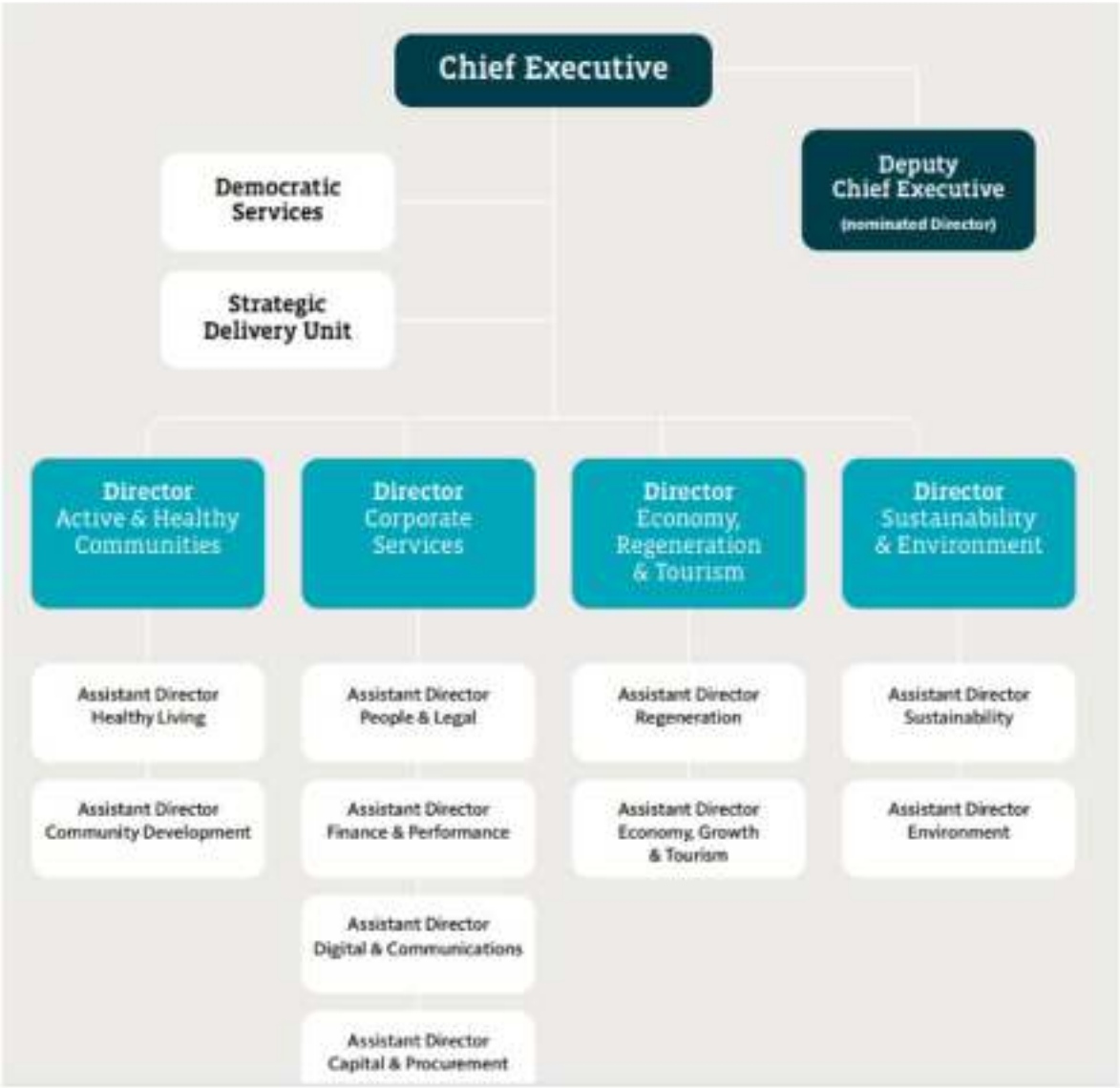
• Environment



• Sustainability



Figure 3 - Council Management Structure



9.0 Financial Information

Net estimated expenditure (2024-25)	
Sustainability	£4,012,735
Environment	£12,501,869
TOTAL: Sustainability & Environment	£16,514,604

10.0 Governance Arrangements

- 10.1 Reviewing performance and reporting progress to Elected Members and other key stakeholders facilitates transparency, accountability and improvement in everything the Council does. The governance arrangements to develop, monitor and report the Council's progress in implementing the Director's Business Plan are outlined below, and are supplemented by regular reviews by the Director and his team. The governance arrangements the Council has put in place to deliver continuous improvement are also subject an annual audit and assessment by the Northern Ireland Audit Office.

Figure 4: Governance Arrangements





Ag freastal ar an Dún agus Ard Mhacha Theas Serving Down and South Armagh

0330 137 4000 (Council)
0330 137 4036 (Planning)
council@nmandd.org
www.newrymouredown.org

Oifig an Iúir
Newry Office
O'Hagan House
Monaghan Row

Newry BT35 8DJ

Oifig Dhún Pádraig
Downpatrick Office
Downshire Civic Centre
Downshire Estate, Ardglass Road

Downpatrick BT30 6GQ

Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	Parking request for Amgen Irish Open 2024 (AIO)
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability & Environment
Contact Officer (Including Job Title):	Geraldine O'Callaghan, SHEP Manager

For decision		For noting only	
	X		
1.0	Purpose and Background		
1.1	<p>The purpose of this report is to seek Committee approval for the following council assets to be used as car parks for the Amgen Irish Open (AIO) in September 2024.</p> <ul style="list-style-type: none"> • Donard Park (upper grass area) • Downs Road car park • Downs Road grass area 		
1.2	<p>The Amgen Irish Open (AOI) is being hosted at Royal County Down Golf Club, Newcastle Co Down from Monday 9th – Sunday 15th September 2024.</p>		
2.0	Key issues		
2.1	<p>As part of the Transport Working Group for the event chaired by DP World Tour with representation from PSNI, DfI Roads, Translink and NMDDC, a review of the wider Traffic Management Plan (TMP) has been developed.</p>		
2.2	<p>To enable the TMP, the event organiser has requested use of two NMDDC car parking areas, namely upper Donard Park and Downs Road in Newcastle and a strip of grassland on Downs Road, detailed below.</p> <p>Donard Park - To facilitate traffic coming from the southern corridor which enters Newcastle via the Kilkeel Road towards the South Promenade, an area within Donard Park (upper grass area) has been requested to facilitate event parking (see Appendix 1). Access/ egress will be via the existing car park entrances/ exits and Shan Slieve Drive. Any overflow will be directed to Northfield Park and Ride site.</p> <p>Downs Road car park - Has been requested due to its size and location to the event site. Several stakeholders participating on the Transport Working Group raised concerns in relation to the suitability of drop off/ pick up at other locations (i.e. 2015 the drop off/ pick up was in front of Bryansford GAA): the public walking/ crossing routes and as well as minimising traffic disruption within the one-way system. (see Appendix 2).</p>		
2.3	<p>As a result of the Working Group discussions and stakeholders' recommendations, a request has been made for the use of the entire Downs Road carpark space, as it provides</p> <ol style="list-style-type: none"> Adequate hardstanding area required to accommodate the Park and Ride drop off/ pick up points to allow for bus movements and parking with close proximity to the event. Minimises significantly the number of public crossing points over main roads for those attending the event using the park and ride facility. 		

	<p>c. Reduces the distance within the one-way system for the park and ride buses on Main Street.</p> <p>d. Accommodates all additional parking for sponsors/ dignitaries and VIPs at this location and close to the event space, therefore no further requirement for additional carparking within any other of the town centre car parks is needed.</p>
2.4	In relation to car parking arrangements, several local sites have been identified (see Appendix 3) in order to minimise traffic disruption, maximise the safety of those attending the event and reduce the impact on local residents and businesses.
2.5	<p>Strip of grassland on Downs Road</p> <p>In consideration of the local church activities, whose congregation use the Downs Road car park on a daily basis and in discussions with the Parish Manager as to activities taking place from 9th- 15th September 2024, an area of land on Downs Road is being requested a noted in Appendix 2. This area is to be reserved for church parking and be available should any unforeseen or as yet unplanned church events arise during the week of the event – funerals/weddings, etc. This area could provide 35 parking spaces for parking provision displaced due to Downs Road carpark use.</p>
2.6	<p>All of the parking areas identified above will be staffed by AOI appointed staff to ensure they are available for use as described and returned to their original conditions on conclusion of use.</p> <p>The above considerations are interlinked to be able to provide a safe drop off/ pick up point for the park and ride buses, provide AOI parking whilst also accommodating the local church/ business who require short term parking.</p> <p>Approvals are required to feed into the overall traffic management system for the event.</p>
3.0	Recommendations
3.1	<p>Members are asked to approve:</p> <ul style="list-style-type: none"> the parking arrangements for the Amgen Irish Open (AIO) in September 2024, as outlined in sections 2.2 to 2.6 of this report.
4.0	Resource implications
4.1	None
5.0	Equality and good relations implications
	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	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 <input checked="" type="checkbox"/></p>
7.0	Appendices
	<p>1. Donard Park</p> <p>2. Downs Road car park and grass area</p> <p>3. Extract from AIO Event Car Parking Overview</p>
8.0	Background Documents
	None

Appendix 1 – Donard Park – upper grassed area

Ref 2.5 - Public park and walk request



Appendix 2 – Downs Road car park and grassland

Ref – 2.6 Park and ride and 2.7 Car parking



Appendix 3 – Extract from AIO Event Car Parking Overview

7

Event Car Park Overview

Car Park	Location	Spaces	Address	Notes/Access
Car Park 1	Royal Co. Down DC	203	203A Loughborough St BT21 4AA	Private (Access via 203A)
Car Park 2	Slieve Donard Hotel	250	Down St, Donaghadee BT21 5LW	Hotel Access Only
Car Park 3	Brown's Road Car Park	185+	Harbourfront, BT21 5AA	Public (Access via 203A)
Car Park 4	Donaghadee GAC	500	10001 Donaghadee BT21 5AA	Public (Access via 203A)
Car Park 5	Royal Co. Down DC	100	10001 Donaghadee BT21 5AA	Public (Access via 203A)
Public Park & Walk	Donaghadee Park	200	Donaghadee Park, BT21 5AA	Public (Access via 203A)
Public Park & Rec	Marine Park	200-50	Marine Park, BT21 5AA	Public (Access via 203A)
TV Campsite	Royal Co. Down	40	10001 Donaghadee BT21 5AA	Public (Access via 203A)



Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	Provision of Portable Toilets at Events
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability and Environment
Contact Officer (Including Job Title):	Sinead Murphy, Director: Sustainability and Environment

For decision		X	For noting only	
1.0	Purpose and Background			
1.1	The purpose of this report is to seek Member consideration of a request for the Council to provide portable toilets for an event with an anticipated attendance of over 10,000 people.			
2.0	Key Issues			
2.1	<p>A request has been received for the Council to consider provision of portable toilets for events where there are over 10,000 people attending.</p> <p>The Council currently provides logistical support for community festivals and events by giving access to council owned equipment such as tables, chairs, barriers and gazebos.</p> <p>Council do not own any portable toilets.</p>			
2.2	Financial assistance is available to community groups to apply for financial support for the delivery of their festivals and events. The provision of portable toilets are eligible costs within the applications for funding for festivals and events. No application for funding has been received by the Council from the organisers of this event.			
2.3	A full list of public toilets across the District with current opening times are listed in Appendix 1. The Council will consider extending the opening times of these facilities on request from an event organiser.			
2.4	Officers would not in a position to anticipate or confirm the number of attendees in advance of any event to determine eligibility based on a threshold of over 10,000 people.			
3.0	Recommendations			
	<p>Members consider the threshold of 10,000 people at an event in the District for provision of portable toilets</p> <p>OR</p> <p>The proposal for portable toilets for events over 10,000 people should be considered as part of the review, agreed by Council of Financial Assistance.</p>			
4.0	Resource implications			
4.1	There is no current budget resource for hiring portable toilets and it would result in an unbudgeted spend of approximately £1,000.			
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><i>n/a</i></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><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> n/a</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 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>None</p>
8.0	<p>Background Documents</p>
	<p>None</p>

Appendix 1 – Public Toilets

Location

<u>PUBLIC TOILET LOCATION</u>
Bessbrook
Bloodybridge, Newcastle
Castle Park, Newcastle
Cranfield, Blue Flag Beach
Central Promenade, Newcastle
Donard Park, Newcastle
Downs Road, Newcastle
High Street, Killyleagh
Island Park, Newcastle
Lislea Drive, Crossgar
Lough Inch Cemetery, Ballynahinch
Loughross, Crossmaglen
Lower Square, Killeel
Marine Park, Annalong
Market Street, Downpatrick
Murlough, Dundrum
New Line, Saintfield
Newry Market
Quoile Road, Downpatrick
Rocks Road, Ballyhornan
Rostrevor Road, Hilltown
Rostrevor Square
South Promenade, Newcastle

Spelga Dam, Hilltown
Struell Cemetery, Downpatrick
The Park, Queen Street, Warrenpoint
The Square, Crossmaglen
The Square, Warrenpoint
Upper Square, Castlewellan
Windmill Street, Ballynahinch

Opening Times:

Facilities	July/August	June & September	October – February	March – May
Newcastle/Warrenpoint	8am – 10pm	8am – 8pm	8am – 4pm	8am – 6pm
All Other facilities	8am – 8pm	8am – 6pm	8am – 4pm	8am – 6pm

Report to:	Sustainability & Environment
Date of Meeting:	19 June 2024
Subject:	Request for support for Sustainable Northern Ireland (SNI)
Reporting Officer (Including Job Title):	Conor Sage, Assistant Director Sustainability
Contact Officer (Including Job Title):	Eamonn Keaveney, Head of Sustainability

For decision	X	For noting only	
1.0	Purpose and Background		
1.1	The purpose of this report is for Members to consider and agree to approve to provide financial support and signing of SLA with Sustainable NI for 2024-25 year.		
1.2	<p>Sustainable NI (SNI) is a charity set up to advance the pursuit of sustainable development by local authorities and others.</p> <p>Sustainable NI manages the Local Government Sustainable Development Forum which provides networking and advice to Council Officers engaged in the field of Sustainability.</p>		
2.0	Key issues		
2.1	<p>Council have previously agreed to pay an annual subscription to Sustainable NI. This year SNI are offering enhanced Levels of Membership offering additional services to assist Councils to comply with the new Statutory Requirements on Climate Change.</p> <p>Subscription costs and support available at each Membership Level is listed below with more detail in the attached letter in Appendix 1.</p> <div><h3>Your Sustainability Membership Plan</h3><div><div><p>SUPPORTER MEMBERSHIP</p><p>KEY FEATURES</p><ul style="list-style-type: none">• Well-researched policy consultation responses.• Sustainable Development Forum Coordination• Decision-making tool for strategies and projects<p>£6000 YEAR</p></div><div><p>ACCELERATOR MEMBERSHIP</p><p>KEY FEATURES</p><ul style="list-style-type: none">• All Supporter Benefits Included• Exclusive workshops delivery• Support for sustainable Economic Development and Procurement<p>£10000 YEAR</p></div><div><p>ACCELERATOR PLUS MEMBERSHIP</p><p>KEY FEATURES</p><ul style="list-style-type: none">• All Accelerator Benefits Included• Strategies and Action Plans Development• Initial Sustainability and Screening Audits<p>£15000 YEAR</p></div></div></div>		

	<p>SNI have agreed to be flexible in the deliverables under each Level and have agreed to help Council with one of our priority areas: developing our Sustainability and Climate Change Strategy as part of Accelerator Membership Level support (£10,000).</p> <p>This level of support is usually only available at Accelerator Plus Membership at £15K.</p>
2.2	<p>SNI are experts on Sustainability and Climate Action and have worked with several Councils on developing Sustainability and Climate Change Strategies and related work areas.</p> <p>The support provided by SNI to Council is considered good value for money and will be vital to helping Council comply with Statutory requirements under the Climate Change (NI) Act 2022</p> <p>A letter requesting support for continuing membership of the Forum is attached (Appendix 1) and SNI have provided a copy of their Annual Impact Report for 2023/2024 (Appendix 2).</p>
2.3	<p>SNI are proposing the following general workplan for 2024/25:</p> <ul style="list-style-type: none"> Assisting public sector organisations to comply with new climate change reporting regulations introduced under Section 42 of the Climate Change (Northern Ireland) Act 2022 Providing timely and well researched policy consultation responses Acting as secretariat for the Sustainable Development Forum, which enables collaboration and coordination of climate action and net zero delivery by public bodies Acting as secretariat for the All Party Group on Climate Action, which provides a forum for discussion between politicians, NGOs, business leaders and academics, to drive progress on climate action Developing a web-based decision tool to help councils and public bodies screen strategies, decisions and investments for climate and environmental impacts Promoting understanding and awareness of sustainability and climate change issues through presentations, webinars and attendance at relevant meetings and forums, when required
3.0	Recommendations
3.1	<p>Members are asked:</p> <ul style="list-style-type: none"> To consider and agree to provide financial support at Accelerator Membership Level and signing of an SLA with Sustainable NI for 2024-25 year.
4.0	Resource implications
4.1	Costs associated with this report are provided within the 2024/25 Revenue budgets.
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 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	
	Appendix 1 - Letter from SNI Appendix 2 - SNI Annual Impact Report 2022/2023	
8.0	Background Documents	
	https://www.sustainableni.org/	

IMPACT REPORT

2023

Sustainable

Northern Ireland



BEHIND THE COVER

The image on the cover carries a strong message: water, justice, too much pressure on our planet, and the overwhelming loss of the Nile is about to reach. We are currently oversteering the use of the Nile for centuries (run in the health of our planet)—continuing along the path will mean putting people and the planet increasingly in harm's way. Through a circular not zero economy, we can release these pressures, bringing humanity back within a care operating

SCAPE



We promote a more sustainable way of living and working to protect the planet and its resources for the benefit of society, now and in the future.

We do this by providing information, advice and support to help individuals and organisations become more sustainable.

Our vision is a fair, green economy that operates within planetary boundaries.

BOARD OF DIRECTORS

64



RACHAEL SINGLETON
Behavioural scientist at the
NI Innovation Lab

Rachael is currently the Chair of the Sustainable NI Board. She is an experienced behavioural scientist who works for the Northern Ireland Civil Service Innovation Lab where she applies psychology to the design and implementation of policy to solve key societal challenges such as climate change.



ALAN MCVICKER
Head of Council Support Unit
at Strategic Investment Board

Alan is Head of the Strategic Investment Board's Council Support Unit which supports councils in the delivery of their capital programmes, with a particular emphasis on waste and the circular economy.



SUSANN POWER
Lecturer at Ulster
University Business School

Susann is a lecturer in Hospitality Management at Ulster University and holds a PhD in Sustainable Tourism. She has recently been appointed the Chair of the University's Sustainability Committee. She is also a National Jury Member for Blue Flag International.



KEITH PATTERSON
Sector Specialist in Waste
and Recycling at WRAP
Northern Ireland

Keith is a waste and recycling specialist at WRAP where he uses an evidence-based approach to develop resource management strategies, behaviour change campaigns, tools, and resources aimed at maximising the value and use of materials.



ROBERT CLEMENTS
Head of Sustainable
Development at
NI Housing Executive

Robert is Head of Sustainable Development at the Northern Ireland Housing Executive, the largest social housing provider in Northern Ireland, where he leads the team responsible for residential energy efficiency, decarbonisation and mitigating fuel poverty.



ANDREW BENFIELD
Ireland Country Manager
at Centex

Andrew is Regional Manager at Centex, an independent, not-for-profit research technology organisation (RTO) and consultancy, specialising in zero emission transport and energy.



IAN GARNER
Consultant at Ulster
Wildlife

Ian served for 20 years as Head of WRAP in Northern Ireland, a key resource efficiency delivery body for the public sector. He currently provides support to Ulster Wildlife on peatland restoration and its long-term management.



JAC CALLAN
Sustainability & Impact
Manager at Visit Belfast

Jac is Sustainability & Impact Manager for Visit Belfast, where she works alongside Belfast City Council and tourism stakeholders to help Belfast become a leading sustainable tourism and events destination.

TEAM
MEMBERS



NICHOLA HUGHES
Executive Director

Known for her tenacity and unwavering optimism, Nichola uses her skills in science and communication to empower others to act on the planetary emergency. She is an experienced climate scientist, policy advisor and communicator and is dedicated to channelling her energy for environmental and social justice. Nichola is very proud to say she loves her job.



**DR FRANCESCA
DI PALO**
Head of Public Service
Services

Francesca is an environmental scientist and ecologist focusing on natural carbon sinks. The desire to merge academia with a hands-on career built on enhancing environmental attitudes and promoting positive behaviour change has led her to develop expertise and experience in a range of areas from conservation to education for sustainable development at an international level. Francesca's energy and passion motivate everyone around her.



CLARE BAILEY
Impact Director

Clare was MLA for South Belfast from 2016-2022 and is a former leader of the Green Party in Northern Ireland. During this time, she worked with Climate Coalition NI to introduce Northern Ireland's first Climate Change Bill. Clare is experienced in strategic management and with her extensive cross-sectoral networks is excited about building a climate-positive future for Northern Ireland.



DR CLAIRE MCVEIGH
Head of Advocacy Services

Claire is a climate scientist with a PhD investigating carbon sequestration in peatland environments. She is passionate about supporting organisations to make positive environmental and social change and has gained experience with a wide range of businesses, including supporting strategy development and environmental impact assessment. Claire enjoys sharing her expertise and being a catalyst for positive change.



AIDEN NOLAN
Student / Volunteer

Aiden is currently in her third year studying Geography at Ulster University. A placement student within Sustainable NI, she is passionate about sustainability and climate change and is excited to pursue her future career in this field.

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1 EXECUTIVE SUMMARY

In this Impact Report, we highlight how we are working to support Northern Ireland's transition to a green, net zero economy. We reflect on both highlights from the work we completed in 2022-23 and the ongoing projects and partnerships we're involved in that continue to bear fruits.

This year, Sustainable NI has been incredibly busy growing the team and expanding services. With support from Dormant Accounts Fund NI, we've been working on becoming more resilient and prepared for the future by pursuing activities that will increase our own capacity and sustainability to better support the transition to a green, net zero economy. With this goal in mind, our Board and Team carried out a strategic review of Sustainable NI's brand identity, mission, aims, services and values. The outcomes led into a new operational plan and a new website which is due to launch in 2023. A new strategy will be published in 2024.

This year we added two new members to our team and with additional capacity, we have been able to do more. Highlights this year include supporting the development of critical government regulations and policies such as the Energy 'One Stop Shop' Implementation Plan, Circular Economy Strategy and Public Body Reporting Duty. We're also looking forward to shaping the NI Climate Action Plan, due for consultation this summer.

In continuing to facilitate the All Party Group on Climate Action despite the collapse of the Northern Ireland Executive and Assembly, we have made sure that climate action remains a political priority for our politicians so that they can take decisive action when back in government.

Our staff continue to perform exceptionally well, with a marked increase in educational outreach and support work this year. The Sustainable Development Forum continues to function as critical support for local government and public bodies to lead transformative change and measurable climate action across the region.

Due to the lifting of lockdown restrictions, we have been able to get out to more events and reach a wider audience than ever before. From engaging with local chambers of commerce to school events, we continue to challenge thinking and raise awareness of the need to be more sustainable and how to achieve it.

We have looked at options to help diversify and grow funding, including through direct service provision, for example by expanding our portfolio of training courses. This year we introduced ten new courses: Sustainable Design & Construction (for those working in capital projects and public realm schemes) and Carbon Literacy Training for interested organisations. We hope to promote these next year.

We continue to offer sustainability audits for businesses and organisations looking to establish a baseline to measure and evaluate progress on sustainability as well as carbon footprinting services. We see this as a key area of growth. We also want to do more to support the third sector. We have been successful in receiving funding to coordinate a regional green clubs programme in 2023-24, in partnership with Ulster GAA, which we are optimistic will evolve into broader support for sustainability and climate action in the third sector.

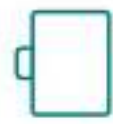
All of this activity exists in the context of a rapidly escalating climate and ecological crisis. Northern Ireland must achieve net zero carbon emissions by 2050. This is a monumental challenge. Organisations are beginning to wake up to the challenge, but there is still a sizeable policy, knowledge and resource gap.

Sustainable NI recognises that rising greenhouse gas emissions can be attributed to consumption. In fact, around 70% of global GHG emissions are linked to material handling and use. It's no coincidence that we are currently transgressing five of nine planetary boundaries that are crucial to planetary health: climate change, land use/cover loss, land system change, chemical pollution, and cycles of nitrogen and phosphorus. Clearly, our relationship with materials requires change. Increasing education and awareness about our consumption habits, and the toll it is taking on the planet and humanity, will be the focus of our work next year.

As we enter 2023-24, we will prioritise our resources to support and guide public, private and third-sector organisations to push the boundaries on climate action. With a Climate Change Act now in place, it is an opportune time for Sustainable NI to extend its role and reach in order to make a positive impact on policy and practice and help secure the sustainable future we all want.

2 IMPACT SUMMARY

Deliverables this year:



2
BUSINESS AUDITS



6
CONSULTATION
RESPONSES



1,745
PEOPLE TRAINED



5
STRATEGIES &
ACTION PLANS



26
WORKSHOPS
OR EVENTS



15
LEARNING
RESOURCES

1,745
People trained

11,000
Visitors on our website



Photo: The roof of Mission City's Ballroom

Impact Report 2023

3 OUR GOALS

Our purpose is to promote a more sustainable way of living and working in order to protect the planet and its resources, for the benefit of society, now and in the future. We deliver this objective through four strategic goals:

1. INFORM

Create positive environmental and social change through education and awareness.

2. REFORM

Campaign for regulatory and legislative change to advance climate action.

3. TRANSFORM

Provide practical support to help organisations achieve their sustainability goals.

4. IMPROVE

Ensure excellent standards and continuous improvement to provide the best service to our members and clients.



4 EDUCATION & AWARENESS

We work to create positive environmental and social change through our education and awareness activities. In 2022-23 these included:

DISSEMINATING INFORMATION AND RESOURCES

We used a variety of platforms to inform and influence including:

- Bi-monthly digital newsletter (reaching 600 people)
- Social media (reaching 1500 people)
- Website (reaching 9,200 people)

Resources developed this year:

- Linn Dhuarg GAA Case Study - a Green Sports Club
- Springfield Meadows Case Study - a Net Zero Passivhaus Development
- Mahon Point Case Study - Ireland's Greenest Shopping Centre
- One Planet Mind Case Study - a Sustainable Clothing Brand
- South West College Case Study - a Passivhaus Premium Building
- 10 Blogs/Articles for the website
- Survey/Report on sustainability in the Third Sector in Northern Ireland
- Briefing note on the Climate Change (Northern Ireland) Act

Talks and presentations this year:

- Mid and East Antrim Borough Council Climate Change Working Group
- Mid Ulster District Council Climate Change Working Group
- Belfast Citizen Jury
- GAA, IFA and Ulster Rugby Green Clubs Webinar
- Fintru Lunch and Learn
- Energy Manager's Forum
- Lisburn Chamber of Commerce Seminar
- SW College Sustainable Future Conference
- NI Retail Consortium Conference
- NI Manufacturing & Supply Chain Conference
- NI Economic Development Conference

PROVIDING HIGH QUALITY AND DIVERSE TRAINING OPPORTUNITIES

We developed the following training courses this year:

- Sustainable Design & Construction for Capital Projects
- Becoming a Sustainable Business (received by businesses in Ards and North Down)
- Developing a Climate Action Plan (received by Mid Ulster District Council, Mid and East Antrim Borough Council)

PROVIDING THE SECRETARIAT FOR THE SUSTAINABLE DEVELOPMENT FORUM

The mission of the Forum is to coordinate and support local government and public bodies to lead transformative change and measurable climate action across the region. It connects, informs and engages sustainable changemakers to turn ideas into action and collaborate on shared objectives.

Membership is exclusive to the public sector. As a member, public bodies have year-round access to an annual programme of meetings, webinars and policy briefings. They also benefit from expert insights from a dedicated Sustainable NI Advisor, who coordinates the Forum. The Chair is currently Emma Adair from Ards and North Down Borough Council.

This year five meetings/events of the Forum were held:

- 16 June 2022 (Belfast)
- 16 September 2022 (Enniskillen)
- 23 November 2022 (Virtual)
- 14 December 2022 (Webinar)
- 8 March 2023 (Virtual)

Local authorities occupy a pivotal role in the transition to net zero by demonstrating public sector leadership on climate action in their local areas as well as becoming key mobilisers of behaviour change at a community level. To capture current activity in the sector, we conducted a survey on climate action taken by local authorities in Northern Ireland. The findings will feature on our new website, due to launch later this year.



5 POLICY & ADVOCACY

We advocate for ambitious legislative and regulatory change in support of our mission through our policy and advocacy work. In 2022-23 this included:

ACTIVELY ENGAGING IN POLICY FORMULATION, APPRAISAL AND LOBBYING

As political appetite for the green economy continues to grow, knowledge needs to be cultivated and shared, to ensure we make the correct policy choices to achieve net zero by 2050. This year we led into several policies that will be critical to meeting our net zero aspirations, including:

- Energy 'One Stop Shop' Implementation Plan
- Review of permitted development rights to protect the environment and help address climate change
- Circular Economy Strategy

In addition to providing written consultation responses, we participated in several government forums and committees to help shape policy and investment in the area of energy and environment:

- NI Affairs Committee Inquiry into Investment in Northern Ireland (Sustainable and gender-equitable investment)
- NI Government Green Growth Forum (Climate Change Reporting Regulations)
- NI Advisory Group on non-household recycling provisions

In May 2022 we launched a manifesto for the Northern Ireland Assembly Elections. In the document, we highlighted four key issues that must be addressed to put the economy on a more sustainable footing whilst simultaneously tackling the climate emergency.

PROVIDING THE SECRETARIAT FOR THE ALL PARTY GROUP ON CLIMATE ACTION

The All Party Group on Climate Action is a forum for discussion between politicians, NGOs, business leaders and academics, to advance climate action through legislative and regulatory change in the Assembly and Executive.

Sustainable NI provides the secretariat for the All Party Group on Climate Action. Membership is cross-party and includes representatives from the NI Assembly as well as NI councils. The Chair is Kate Nicholl MLA.

For the 250+ observers, it is a great way to keep abreast of climate and environmental policy and legislation and influence policymakers at the highest level in Northern Ireland.

The APG met five times in 2022-23, including:

- 22 June 2022 (NGMI)
- 21 September 2022
- 16 November 2022
- 25 January 2023
- 22 March 2023

A range of issues, projects and campaigns were discussed from sustainable food growing (Aran Fann), fuel poverty and cost of living, green hydrogen, energy policy & strategy, the office for environmental protection, expansion of rail infrastructure and local authority climate action (Belfast City Council).

PRIORITIES IN THE SUSTAINABLE NI MANIFESTO FOR ASSEMBLY ELECTIONS 2022:

1. **Green government agenda** to ensure the government 'does as it says' in relation to protecting our climate and environment.
2. **Improved planning for a green economy** calling for a simplification of local authority and regional planning in support of renewable and low-carbon energy, including better guidance on ways to achieve Net Zero.
3. **End government support for fossil fuels** and introduce incentives for energy efficiency measures, heat pumps, district heating and low-carbon retrofit measures.
4. **More investment in sustainable travel infrastructure** through a Clean Air Act and strategic review of public transport pricing, availability and cycling infrastructure.
5. **More government support for community energy** so that community groups can explore the feasibility of community energy schemes.



We provide practical support to help organisations achieve their sustainability goals. Our advisory services include strategy development, reporting, training, workshops and communications support.

STRATEGIES AND ACTION PLANS

Sustainability has become increasingly critical for organisations to remain relevant and competitive today. Like digital transformation, driving sustainability requires organisations to transform every business division, making sustainability an integral part of corporate strategy. This year, we supported five organisations to develop sustainability and/or climate change plans, each one tailored to the individual client's support needs.

- Northern Ireland Housing Executive
- Apex Housing Association
- Mid Ulster District Council
- Lisburn and Castlereagh City Council
- Mid and East Antrim Borough Council

In most of these organisations, we delivered workshops to co-design the strategies with staff and decision makers.

SUSTAINABILITY AUDITS AND REPORTS

Our Sustainability Audit analyses and measures sustainability in a company's day-to-day operations and its overall business model. It identifies opportunities to rethink and improve upon product and service design, operations, and business models to maximise social and environmental impact. This year, we carried out sustainability audits for two local businesses:

- Castle Mall, Antrim
- Merrylee Security, Lisburn

The output was a clear sustainability roadmap to guide the companies on how to embed sustainability within the core of the business.

PARTNERSHIPS

The power of partnership working cannot be understated. Partnerships build momentum, coordinating action between organisations and allowing opportunities to exchange views, supporting innovation and providing additional momentum to get things done. Existing partnerships include the Sustainable Development Forum, the Circular Economy Coalition which has been collectively working on developing a Circular Economy Strategy for Northern Ireland, and the Northern Ireland EV Consortium which was successful in securing £1,340,370 this year for new residential EV charging infrastructure.

Additionally, we became a partner in the Green Clubs Programme. Led by the GAA, the programme is structured around the themes of Energy, Water, Waste, Biodiversity and Travel & Transport and is designed to promote sustainability awareness and action in GAA clubs and communities. We supported the development of the Green Clubs Toolkit and delivered a webinar called 'Clubs Going Green' in September 2022.

SUSTAINABILITY SOLUTIONS & FOR LOCAL BUSINESSES & ORGANISATIONS

Many businesses have already recognised that a sustainable business strategy brings them a competitive advantage. By lowering operating costs and improving brand appeal, sustainability can lead to increased profits. It can also help reduce risk from energy price volatility to supply chain failures. However, sustainability can be a complex business. To help organisations make continual progress and demonstrate impact, have a team of experts who can

help by providing advice, workshops and bespoke planning to help organisations on their sustainability journey. Our advisory services are available for private, public and voluntary sector organisations, with content and delivery tailored according to the client's needs and focus areas. Our services have been designed around a suggested approach to delivering sustainability, which embraces four themes:

1. DEVELOP A VISION FOR SUSTAINABILITY AND EMBED IT INTO STRATEGY

A good strategic vision looks beyond the lifetime of whoever creates it and focuses on joined-up thinking to ensure services and operations are designed with environmental, social and economic objectives in mind. Our strategy workshops and action planning sessions help you see the big picture and deliver a bold strategy fit for the future.

2. MEASURE PERFORMANCE THROUGH ROBUST METRICS AND REPORTING

Metrics are key to ensuring you deliver on your climate and sustainability promises. We help organisations select the most relevant KPIs, allowing them to track progress on sustainability where it matters most. We can also review your carbon footprint, making recommendations on how to reduce emissions and improve reporting procedures.

3. USE COMMUNICATION TOOLS TO CONVINCE CORE STAKEHOLDERS

By definition, sustainability requires extensive collaboration among internal and external stakeholders. We provide a range of tools to successfully involve and engage your stakeholders. From campaign materials to staff inductions, we know how to convince your board, staff, investors and customers of the value of your sustainability strategy.

4. STRENGTHEN CAPACITY & SKILLS TO REALISE YOUR VISION

Sustainability is everyone's business. From the CEO to Grounds Maintenance, we can empower your team to become change makers, providing tips to overcome challenges on the road to sustainability. The training courses we offer are highly customisable and are aligned to the stages of your sustainable transformation.



7 GOVERNANCE & IMPROVING STANDARDS

We are continually striving to ensure excellent standards and continuous improvement to provide the best service to our members and clients.

ENSURING GOOD GOVERNANCE

This year we said goodbye to three board members and welcomed five new board members. Resignations included: Aude Foley, Nuala Flood and Andrew Cassells. New board members included: Keith Patterson, Rachael Singleton, Robert Clements, Andrew Benfield and Jac Callan. All Trustees received governance training and completed a self-assessment. Four board meetings took place this year, including the AGM on 6 December 2022.

SUPPORTING THE WORKFORCE

Our staff are our primary asset and investing in the workforce is a key priority. This year we recruited two additional staff members including the Head of Advisory Services (April) and the Interim Director (March). We hosted one placement student (September to March). Staff training was provided in support of skills development and we carried out a staff engagement survey over the summer which resulted in a review of and subsequent increase in staff pay. We also reviewed our policies and benefits to ensure they promote employee well-being and support equality. This resulted in several new policies such as incremental annual leave in recognition of long service, well-being leave provisions and a career break policy.

GROWING RESILIENCE

The Dormant Accounts NI funding received this year provided Sustainable NI with an opportunity to strengthen resilience in the organisation. With grant support received over two years, 2022-23 & 2023-24, the aim of the project is to strengthen the business plan, making the charity less reliant on income from one source and instead diversify revenue, strengthening existing income and fundraising for new resources.

We used some of the funding to carry out a review of our brand identity, working with a graphic design house to update our logo, values and marketing materials including a new website. The website was built in 2022-23 and will be launched in the summer. As well as a brand review, we reviewed our key services and developed a suite of new training courses to cater for a range of client needs which will provide a future source of income as part of our Advisory Services. We also used the funding to carry out a review of sustainability in the Third Sector, to build a stronger case for funding.

We have also been working on a web-based decision tool for councils and public bodies to clearly show the environmental and social implications of proposed decisions. The tool is based on 'Planet Economics' which is a visual framework for sustainable development. The aim is to make the screening assessment mandatory across public sector decision-making processes, challenging strategies, procurement and investment decisions. The tool will help audit bodies satisfy the requirements of the Sustainable Development Statutory Duty (2007) and indirectly will support Public Body Reporting Duties under the Climate Change Act (2023).

As the output is a digital solution we received expert mentoring and support through the Digital Surge Programme. The Digital Surge Programme is a NI-wide programme that is funded by all 11 local authorities. It supports businesses that are deemed to have digital transformation potential. We will be ready to proceed with app development in the summer and the project is due to be completed in 2023.

8 ACKNOWLEDGEMENTS

We would like to place on record our gratitude to all the organisations and individuals who continue to support the work of the organisation. Our work would not be possible without the support of our clients and funders. We also want to thank the many volunteers who freely give their time to help the charity. Funders this year were:





sustainableni.org



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Marie Ward, Chief Executive
Newry, Mourne and Down District Council

22 January 2024

Dear Marie

SNI New Membership Model

Thank you for your continued support of Sustainable Northern Ireland as one of our valued members. It has been hectic since the introduction of the Climate Change (Northern Ireland) Act 2022, and we look forward to continuing to provide our services in helping you embed these new regulations and responsibilities as we work together toward a sustainable future.

Based on the recent Needs Analysis with all our members and Local Authorities at the end of 2023, we have tailored membership packages to provide wider flexibility for the emerging needs and support services you require.

These now include the [Accelerator and Accelerator Plus](#), as well as the Supporter membership.

We have included our Impact Report (2022/2023) summarising the wider work of the organisation last year.

Memberships Overview

Your Sustainability Membership Plan

<h3>SUPPORTER MEMBERSHIP</h3> <p>KEY FEATURES</p> <ul style="list-style-type: none"> • Well-researched policy consultation responses. • Sustainable Development Forum Coordination • Decision-making tool for strategies and projects <p>£6000 YEAR</p>	<h3>ACCELERATOR MEMBERSHIP</h3> <p>KEY FEATURES</p> <ul style="list-style-type: none"> • All Supporter Benefits Included • Exclusive workshops delivery • Support for sustainable Economic Development and Procurement <p>£10000 YEAR</p>	<h3>ACCELERATOR PLUS MEMBERSHIP</h3> <p>KEY FEATURES</p> <ul style="list-style-type: none"> • All Accelerator Benefits Included • Strategies and Action Plans Development • Initial Sustainability and Screening Audits <p>£15000 YEAR</p>
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Your Membership Renewal

Sustainable Northern Ireland is an independent charity funded by our members.

We understand that this is a challenging time for many organisations. Without your membership, we could not continue supporting Northern Ireland's public bodies in creating a sustainable future through our advocacy, information, and service provision.

Your Membership is due to renew for another year, and SNI will request the due amount on 1 April 2024. Please contact us by 15 February at the latest if you would like to discuss or make any changes to your membership.

There is much to do in 2024-2025. We will continue to support local government and public bodies by:

- Assisting public sector organisations to comply with the new climate change reporting regulations introduced under Section 42 of the Climate Change (Northern Ireland) Act 2022
- Provide timely and well-researched policy consultation responses
- Managing the Sustainable Development Forum, which enables collaboration and coordination of climate action and net zero delivery by public bodies
- Advancing the development of a web-based decision-making tool to help councils and public bodies screen strategies, decisions and investments for climate and environmental impacts
- Promoting understanding and awareness of sustainability and climate change issues across your organisation through presentations at relevant meetings and forums on request
- Providing training and follow-up 1-2-1 on understanding Scope 1, 2, and 3 emissions and learning how to use the Greenhouse Gas Accounting Tool and the Waste Emissions Calculator

Based on your feedback you may now wish to upgrade your membership and avail of either our Accelerator Membership package or the Accelerator Plus. Both packages provide additional support services from the Supporter Membership.

The **Accelerator Membership** includes the development of bespoke resources and the delivery of exclusive workshops; 1-2-1 support for Economic Development and Procurement aimed at

- cutting down Scope 3 emissions in your local council area,
- setting measurable targets and
- helping create the conditions for sustainable and inclusive growth.

The **Accelerator Plus** includes

- the development of strategies and action plans (Sustainability, Climate and Sustainable Procurement, (or bespoke on request)
- access to initial sustainability and screening audits.

Compare memberships in the [Table Below](#).

Memberships Features

MEMBERSHIPS FEATURES		Supporter Membership	Accelerator Membership	Accelerator Plus Membership
	Support for new climate reporting regulations compliance	✓	✓	✓
	Timely and well-researched policy consultation responses	✓	✓	✓
	Sustainable Development Forum Coordination	✓	✓	✓
	Advancement of web-based decision-making tool for screening strategies and projects	✓	✓	✓
	Training to understand Scope 1, 2 and 3 emissions and how to use Greenhouse Gas Tool and Waste Emissions Calculator	✓	✓	✓
	Presentations to increase sustainability awareness	✓	✓	✓
	Development and delivery of exclusive workshops (Sustainable Capital Projects, Sustainable Procurement, etc.)	✗	✓	✓
	1-2-1 Support for Economic Development and Procurement for Scope 3 Emissions cut and measurable targets	✗	✓	✓
	Bespoke Resources Development	✗	✓	✓
	Initial Sustainability and Screening Audits	✗	✗	✓
	Development of Strategies (Sustainability, Climate, Sustainable Procurement)	✗	✗	✓
	Development of Action Plans (Sustainability, Climate, Sustainable Procurement)	✗	✗	✓

We are excited to be working with you again in what is already shaping up to be an important year, and if you wish to discuss your options and membership package, please do not hesitate to get in touch.

If you wish to proceed with a Supporter Membership in 2024-25, please raise a purchase order no later than 31 March to facilitate prompt payment in April.

If you wish to proceed with an Accelerator Membership in 2024-25, please raise a purchase order no later than 31 March to facilitate prompt payment in April.

If you wish to proceed with an Accelerator Plus Membership in 2024-25, please raise a purchase order no later than 31 March to facilitate prompt payment in April.

If you wish to upgrade your initial Membership later in the year or have any queries about these requests, please do not hesitate to contact us.

Thank you for your support

Sustainable Northern Ireland is an independent body that relies on membership support, and your support this year has made a real difference; thank you.

Continuing your membership is the most important way to sponsor us while experiencing the unique support available to your sector. We look forward to working with you this coming year.

Yours Sincerely,



Dr Francesca Di Palo
SNI Head of Public Sector Services

Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	Live Here Love Here initiative and Eco Schools programme from Keep Northern Ireland Beautiful 2024 - 25
Reporting Officer (Including Job Title):	Conor Sage, Assistant Director Sustainability
Contact Officer (Including Job Title):	Eamonn Keaveney, Head of Sustainability

<table border="1"><tr><td>For decision</td><td>X</td><td>For noting only</td><td></td></tr></table>		For decision	X	For noting only	
For decision	X	For noting only			
1.0	Purpose and Background				
1.1	The purpose of this report is for Members to consider and agree to approve the financial support and the signing of an SLA for the period 2024 - 2025 to support the Keep Northern Ireland Beautiful (KNIB) Live Here Love Here campaign and Eco Schools Programme across the District.				
2.0	Key issues				
2.1	<u>Live Here Love Here (LHLH)</u> <ul style="list-style-type: none">LHLH has three main elements: a media campaign, a volunteering support programme and a small grants scheme. It is building a movement of enthusiastic local people who volunteer their time and expertise to promote Civic Pride, particularly by tackling littering, dilapidation of buildings and improvement of green space.The LHLH media campaign has been instrumental in helping achieve these incremental gains using bespoke billboards in supporting council areas, television and radio advertising and increasingly, social media to reach specific audiences.Keep Northern Ireland Beautiful is requesting continued support for the programme in the Newry, Mourne and Down area (see letter Appendix 1 and LHLH Impact Report Appendix 2).This would require an annual budget of £26,000 as in previous years.It should be noted that half (£13,000) of the Council's funding goes straight back into supporting this area through the small grants programme.				
2.2	<u>Eco Schools</u> <ul style="list-style-type: none">Keep Northern Ireland Beautiful is requesting a contribution from the Council for the period 2024 – 25 for delivery of the Eco Schools Programme in the District (see letter Appendix 3).The amount requested remains the same as last year for delivery of the Eco Schools Programme at £2,975.				

	<ul style="list-style-type: none"> The current programme in Newry, Mourne and Down has proven highly successful. 131 schools in the District are registered with the programme (See Appendix 4 NMD Impact Card). Currently 83 schools have obtained green flag status. Schools undertaking the programme work on ten environmental topics - Litter, Energy, Water, Waste, Transport, Healthy Living, Schools Grounds/Outdoor Learning, Biodiversity, Global Perspective and Climate Change. These topics, and the work carried out by schools, are in keeping with the mission statement contained in the corporate plan: "to lead a district that is prosperous healthy and sustainable". The Council's Environmental Education Officers based in the Sustainability Team provide educational talks and assistance and organise initiatives and events which assist schools in achieving their green flag award.
2.3	<p>The total contribution to KNIB for the period 2024 - 2025 to support the Live Here Love Here campaign and Eco Schools Programme across the District is £28,975.</p> <p>Breakdown as below:</p> <ul style="list-style-type: none"> Live Here Love Here for the 2024-2025 period at a cost of £26,000 Eco Schools Programme for the 2024-2025 period at a cost of £2,975 Officers will develop an SLA with KNIB to be signed by Council and KNIB CEO.
3.0	Recommendations
3.1	<p>Members are asked:</p> <ul style="list-style-type: none"> To consider and agree to approve the financial support and the signing of an SLA for the period 2024 – 2025, as outlined in section 2.3 of the report, to support the Keep Northern Ireland Beautiful (KNIB) Live Here Love Here campaign and Eco Schools Programme across the District.
4.0	Resource implications
4.1	Costs associated with this report are provided within the 2024/25 Revenue budgets.
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><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	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 <input type="checkbox"/></p>
7.0	Appendices
	<p>Appendix 1 - Letter from KNIB Re LHLH</p> <p>Appendix 2 - LHLH Impact Card</p> <p>Appendix 3 - Letter from KNIB Re Eco Schools</p> <p>Appendix 4 - Eco Schools Impact Card</p>
8.0	Background Documents
	None



Dear Councillor,

I am writing to you to give you an update on the Live Here Love Here campaign and to make the case for continued support from your council area over the next financial year. As an elected representative you can rightly be proud of the role your council has played over the past year in helping Live Here Love Here achieve some impressive results for local residents. At Keep Northern Ireland Beautiful, we want to step up the progress and keep a good thing growing.

Live Here Love Here is an integral part of your council's approach toward supporting communities and fighting back against the climate emergency. It is Northern Ireland's leading behaviour change campaign that is truly transforming communities and people. Our work builds resilient communities that can thrive even in the most difficult of economic times. One of the benefits of our approach is that we bring groups, elected representatives, council officers and other streams of funding together to make a big impact. To put it simply, we make your funding go further.

A few simple facts will make this clear. In 2024/25, we are asking for **£26,000** of financial support. This is to continue our work from previous years. Working in partnership, Live Here Love Here is delivering for ratepayers. Last year, we attracted a **further £262,479** in funding, **which is a return of £9.06 for every £1 invested**. This investment has supported your community groups, town centres, green spaces and local economy. Live Here Love Here is also a campaign focused on putting in place the behaviours that will save council resources on waste collection and littering over the longer-term. We are already making some important progress on these issues and it is right to keep moving forward now.

Live Here Love Here is about more than just tackling litter. Our work helps communities thrive by encouraging collaboration and achieving common goals that benefit all of us. Whether it is developing community gardens or supporting clean-ups, we bring people together in a common effort to help each other. Not only does this combat loneliness but also helps improve the mental health outcomes of those who take part in our campaign. The physical and mental health benefits go hand in hand with the environmental benefits that are delivered by Live Here Love Here.

I am very aware we are in a fiscally difficult environment for local government. There are increasing demands for scarce resources. That is why once again, I am asking for no increase in the Live Here Love Here budget for the next financial year – that is ten years of no increases, despite high inflation. The team at Keep Northern Ireland Beautiful take our role as custodians of public money seriously and this is why we are happy to play our part in tough economic times. My focus is on ensuring the critical work that Live Here Love Here does continues and that we build more inclusive and thriving communities.

Attached to this letter is an impact card for this local council area. I would encourage you to take a few minutes to look at it and see the transformation that is happening due to the work of this small and dedicated team. All I am asking for in this letter is that we get the support to keep on doing what we do best. Working with you to help change this place for the better. Your investment makes a huge difference to thousands of people across this council area. Let's keep moving forward together.

If you have any questions, please don't hesitate to contact me.

Thank you very much for your time.

Yours sincerely,

Lynda Surgenor

Live Here Love Here Manager

Supporting your community journey to Net Zero

85

Killyleagh Community Association

With support from multiple grant programmes, the Community Association has installed new litter bins and created planted areas for pollinators as part of a wider anti-litter and civic pride campaign in Killyleagh and Shrigley.

The group of volunteers meet regularly to litter pick and tend to gardening projects, all of which brings the group together for fun and rewarding work, helping to adopt a very positive mental outlook on life. They've received many compliments about how good Killyleagh looks from visitors and on their Facebook page. It has helped bring about a multiplier effect of more people wanting to be involved in more projects. They now have a Clean Team, Green Team and Events Team.



Live Here Love Here Small Grants Scheme

8 projects delivered

amount awarded by the Council

£13,000

Marine Capital Grants

4 project delivered

amount awarded

£11,158

School Pollinator Grants

26 projects delivered

amount awarded

£212,436

By Numbers...

164 Adopt A Spot groups and 2,060 volunteers supported

17 Live Here Love Here Community Support Events

9 Green Flag Parks and Open Spaces

37 groups supported across grants

67% prompted awareness of LHLH campaign

126 Litter surveys undertaken

34 Awards presented to well-managed beaches, parks, schools and stations

Eco-Schools

45 Green Flag Eco-Schools

34 School support visits and events

8,856 Young people engaged in Eco-Schools

NI Media Reach and Value

2,544,880
£571,203

1,049,740
£147,257

Find out more

Check out projects supported by Keep Northern Ireland Beautiful in your Council area.



KEEP NORTHERN IRELAND BEAUTIFUL



Bottom Line	Live Here Love Here investment by Council	Total additional funds invested in Council area
£26,000		£262,479
£2,975	Eco-Schools investment	return on every £1 invested by the Council
£2,975		£9.06

Reporting Period – 1st April 2022- 31st March 2023.

Report to:	Sustainability and Environment Committee
Date of Meeting:	19th June 2024
Subject:	Food Service Plan 2024/25
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability & Environment
Contact Officer (Including Job Title):	Sinead Trainor, Assistant Director Environment

	For decision	x	For noting only	
1.0	Purpose and Background			
1.1	That members consider and agree to adopt the attached Food Service Plan 2024/25			
2.0	Key Issues			
2.1	<p>The Food Standards Agency (FSA) requires Newry Mourne and Down District Council to have an up-to-date, documented food service plan which is readily available to food business operators and consumers. The plan must be subject to regular review and clearly state the period of time during which the plan has effect.</p> <p>The plan covers all areas of food law that the council has a duty to enforce and sets out how it intends to deliver official controls within its area. The plan includes imported food responsibilities and the control arrangements in place. The plan also includes reference to the council's approach to enforcement as including its alternative enforcement strategy for dealing with those establishments rated as low risk under the food establishment intervention rating scheme set out at in the Food Law Code of Practice.</p> <p>Advice issued by FSA in NI and work identified in conjunction with the other councils in Northern Ireland to consistently fulfil our statutory obligations and duties in relation to food safety and through the NI Food Managers group and the various subgroups was considered when drafting this food service plan.</p> <p>The FSA provides grant funding to the council for the purpose of enabling us to fulfil our duties across the range of responsibilities within the local authority food service in Northern Ireland as directed by EC Regulations and national legislation.</p>			
3.0	Recommendations			
	That Committee agree to adopt attached Food Service Plan 2024/25			
4.0	Resource implications			
	Within existing Budgets			
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>			

	<i>n/a</i>	<input checked="" 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 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><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> <p><i>n/a</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 <input type="checkbox"/></p>	
7.0	Appendices	
	Appendix 1 – Food Service Plan 2024/25	
8.0	Background Documents	

Agóiméal ar an Dáil
againn agus arís. **Serving Down
and South Anagh.**



Cathairre Ceimiciúil
an Iúir, Mhúrn agus an Dúin
Newry, Mourne and Down
District Council

NEWRY, MOURNE & DOWN DISTRICT COUNCIL

**Health and Wellbeing Department
Food Service Plan**

2024/2025

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INTRODUCTION AND PRIORITIES FOR 2024 -25

There are 2292 food businesses registered with Newry, Mourne and Down District Council. These businesses include primary producers, manufacturers, transporters and distributors, restaurants and caterers, retailers, hotels and hospitals. We have 57 EC

approved premises and 3 Integrated premises, the highest number in Northern Ireland, and many of those are fishery premises.

We operate a Point of Entry/Border Control Post for products requiring Sanitary and Phyto-sanitary (SPS) checks on Agri-food goods entering through Warrenpoint Port.

There is a thriving fishing industry in the council area. We provide advice and support to this industry, in addition to being responsible for carrying out Food Hygiene and Food Standards Official Controls. This includes the registration and inspection of the fishing fleet, approval of premises under Regulation (EC) 853/2004 and issuing of Third Country Export and Health Certificates and Supporting Health Attestations for trade from NI to GB and on to NI/GB.

We continue to work in conjunction with the Food Standards Agency (NI) and other councils in Northern Ireland (NI) to consistently fulfil our statutory obligations and duties in relation to food safety and through the NI Food Managers group and the various subgroups, we aim to address the following NI wide priority issues in the coming year:

1. Support the implementation of the new food standards delivery model.
2. Produce a training resource for Officers on Food Standards Inspection for Butchers in conjunction with other Councils
3. Work jointly with DAERA to ensure Export Health Certificates are issued in accordance with Third Country requirements and to work with DAERA and PSA in respect to the implementation of the Windsor Framework.

SECTION 1 - SERVICE AIMS & OBJECTIVES

1. Aims & Objectives

Newry, Mourne and Down District Council recognises the key role it plays in securing the safety of food produced and consumed in the district. This plan's key focus is to demonstrate how the Council will fulfil its statutory obligations and duties in relation to food safety.

The stated aim of the Food Standards Agency is to ensure that food law enforcement is undertaken by the various agencies in a more effective, comprehensive and collaborative manner. This Food Safety Service Plan sets out to achieve these objectives.

1.1. Aims

The Food Service Plan forms part of the wider planning process within the Council. The Corporate mission, vision and values of the Council are translated into operational objectives through this service plan, which will be implemented by the food control team within the Health and Wellbeing Service.

The Food Service delivered on behalf of Council aims to:

- Reduce the risk to consumers by striving to ensure that all food produced, imported or sold within the district is fit for human consumption, is of genuine quality and composition, is correctly labelled and is free from contamination.
- Actively contribute to the Food Standards Agency's Priorities for 2023/24.

1.2. Objectives

To deliver the aims of the Food Control Service the following objectives and targets have been drawn up.

- To carry out all food hygiene interventions, following the Food Law Code of Practice and the recommended frequencies based on risk assessment, assess food handling practices, identify hazards and take appropriate action to remedy problems identified.
- To implement the statutory Food Hygiene Rating Scheme throughout the District in line with the FSA Guidance.
- To carry out all food standards interventions in food premises, following the Food Law Code of Practice and the recommended frequencies based on risk assessment, to ensure that legal requirements are met in relation to the quality, composition, labelling and advertising of food.

- To assist businesses with and monitor their compliance with the Food Information (NI) Regulations 2014 as amended, the requirements to provide allergen labelling on PPDS foods which came into force on 1st October 2021.
- To carry out a proactive and reactive food sampling programme for microbiological examination and chemical analysis to provide independent assurances that products manufactured and sold in the district are safe to eat, not adulterated by undeclared ingredients and correctly labelled.
- To investigate complaints relating to food, food premises and practices following the approved procedure with a view to raising standards in all food businesses.
- To investigate all incidences of food borne illnesses as notified by PHA or members of the public.
- To respond to all National food safety alerts following agreed Codes of Practice.
- To ensure as far as reasonably practicable, that imported food used or sold in premises within the district complies with UK and European Food Law.
- The Council will act as Home Authority to food manufacturing and distribution companies located within the district, providing advice and responding to requests for "Home Authority" reports from other Local Authorities throughout the country thus helping businesses maintain their competitive edge in the wider market.
- To provide informed and helpful advice to businesses and the public alike on matters relating to food safety.

1.3. Links to Corporate Objectives and Plans

The Council's Environmental Health Service plays a key role in delivering the Council's strategic objectives of supporting improved health and wellbeing outcomes. The Corporate objectives are detailed in the Corporate Plan 2024 - 2027 which shows how the objectives will be achieved and how success will be measured. The food control service plan forms part of this wider planning process to be adopted by the Council. The strategic objectives of the Council, outlined below, will be translated into operational objectives and in turn into this service plan, which will be implemented by Environmental Health.

Support the continued growth and development of our local economy

- Improve the health and wellbeing of everyone in the district
- Protect and enhance our environment to secure a sustainable future
- Support regenerative tourism opportunities which promote our culture, heritage and environment
- Empowering communities to play an active part in civic life

- Develop and revitalise our district
- Deliver sustainable services
- Represent the voice of the district with our partner.

1.4. Corporate Mission and Values

The vision of our council is that 'Newry Mourne and Down is a place with strong, safe and vibrant communities where everyone has a good quality of life and access to opportunities, choices and high-quality services which are sustainable, accessible and meet peoples' needs.'

The council's mission is 'To deliver sustainable services and empower our communities through transparent governance.'

The values of the council are;

- Respect
- Transparency
- Excellence
- Integrity
- Accountability

SECTION 2 – BACKGROUND

2.1 District Profile

With an estimated population of 181,368 and a coastline of approximately 100 miles, Newry, Mourne & Down District Council is the third largest Council area in Northern Ireland. The council area includes the city of Newry and the towns of Downpatrick, Ballynahinch, Newcastle, Warrenpoint and Kilkeel.



Newry is located on the main A1 Road linking Belfast to Dublin and has a busy rail connection link between the two cities also. Newry City Centre has a large, modern bus station servicing both local, intra provincial and all Ireland bus networks. 2.6 million people, almost half the population of Ireland live within a 70-mile radius of Newry City. The positioning and ease of access to the City has facilitated and encouraged a considerable retail trade particularly with shoppers from the Irish Republic.

The District has a well-developed transport infrastructure to support industry including the modern port of Warrenpoint, the third largest port in Northern Ireland. The port plays a pivotal role in the District by developing trade to and from the North and South of Ireland. It has a diverse range of scheduled services to Great Britain and Continental Europe and is achieving consistent growth in tonnage handled year on year.

The district also has a long-standing, well-established fishing industry. Based on 2023 figures provided by DAERA, Ardglass and Kilkeel are within the UK's top 20 ports in terms of the tonnage of fish landed by UK vessels. In 2023, more than 6,231 tonnes of fish and shellfish were landed in the ports of Ardglass and Kilkeel with a value of £15.7 million. These landings supply an extensive land-based fish processing industry in the council area.

2.2 Organisational Structure

Food Control is one of the functions of the Sustainability and Environment Directorate, staff are based in offices located in Newry, Downpatrick, Kilkeel and Warrenpoint.

The Food Service Team is managed by Head of Environmental Health (Commercial) who reports to the Assistant Director of Health & Wellbeing.

The Food Service Team comprises of 13.25 (currently 12.25) full-time equivalent District Environmental Health Officers and a Technical Officer. These officers report to the either Senior Environmental Health Officer (Food Safety) or Senior Environmental Health Officer (Imported/Exported Food and EC Approvals) who reports to the Head of Environmental Health (Commercial).

The team are supported by administrative officers, based in Newry and Downpatrick. Work is prioritised for each activity, in each core function based on risk assessment and in compliance with the FSA's Food Law Code of Practice and Practice Guidance where appropriate.

The Assistant Director Environment reports to the Council through the Sustainability and Environment Committee monthly and has delegated powers to act on the Council's behalf.

Specialist services are provided by several external agencies including:

- Food Standards Agency (NI)
- Eurofins (UK) (the Council appointed Public Analyst),
- the Public Health Laboratory Service (Belfast City Hospital),
- DAERA Aquatic Sciences Research Division,
- DAERA (Pesticides and Antibiotics)
- Public Health Agency
- DAERA (Meat Hygiene Services)
- AFBI.

Access to specialist advice is also available from Campden, LGR and the Council's Legal Representatives.

Assistance from other Departments within the Local Authority may also be utilised as and when required.

2.3 Scope of the Food Safety Service

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The Department is responsible for the enforcement of The Food Hygiene Regulations (Northern Ireland) 2006 and The Food Safety (NI) Order 1991, Food Law Code of Practice, EU Regulations and ancillary legislation made thereunder. This will be achieved by the following planned and reactive activities:

1. Planned Work:
 - Planned food hygiene inspections
 - Planned food standards inspections
 - HACCP visits
 - Food Hygiene Rating Scheme assessments
 - Revisits to monitor compliance
 - Alternative enforcement programme
 - Imported food checks at Warrenpoint port
2. Response Work:
 - Advice, telephone queries and other visits
 - New premises advice visits and inspections
 - Revisit requests and Appeals for the Food Hygiene Rating Scheme
 - Food complaints investigations
 - Food poisoning investigations and outbreak control
 - Infectious disease notification investigations
 - Responding to Food Alerts
 - Examination of and provision of health certificates for foods exported to third countries
 - Port health and imported food
 - Provision of Export Health Certificates
 - Provision of Support Health Attestation Documents for export
3. Sampling:
 - Bacteriological food and water
 - Chemical food and water
 - Shellfish sampling
 - Wild Caught Fish Sampling
 - Radiation
4. Service Management:
 - Service monitoring and supervision
 - Court proceedings

- Co-ordination and uniform enforcement
- Reporting to Council
- Forward planning
- Quality systems implementation
- Stakeholder consultation

5. Health & Wellbeing Promotion: Training seminars
- Health education
 - Research
 - Community Advice
 - Student training

2.4 Demands on the Food Safety Service

As a premier tourism destination, there is an increased weekend and seasonal trade, which increases the customer base and, therefore, the number of complaints, food poisoning allegations and the need for reactive sampling and interim inspections.

These premises are inspected by District Environmental Health Officers based on risk assessment which is used to form a schedule of programmed inspections for both food hygiene and food standards, in accordance with current FSA Codes of Practice. Increased and focussed sampling initiatives are planned for this time of year.

The World Health Organisation recommendations are that there should be provision for the sampling of foodstuffs at a rate of 2.5 samples per 1,000 population. Tourism increases this population in the summer months and as such the sampling commitment is an essential element of the continued public health protection.

The Council has 2292 food premises currently registered as trading for which the authority has food enforcement responsibility. They fall into the following main usage categories:

Premises Type (Main Usage)	No. of Premises	Percentage (%)
Primary Producers	193	8.42
Manufacturers and Packers	179	7.81
Importers/Exporters	2	0.09
Distributors/Transporters	51	2.22
Retailers	415	18.11

Restaurants and Caterers	1452	63.35
TOTAL	2292	100%

Premises Requiring EC Approval

There are 57 premises approved to operate under the EC Regulations and 2 integrated premises. These premises are inspected in accordance with our risk-rating programme.

Establishment Approval Type	Number of Premises Approved
Auction Halls	2
Cold Stores	7
Fish Processing Plants	16
Dispatch Centres (LBM)	6
Freezer Vessels	7
Meat Preparation Plants	3
Meat Processing Plants	12
Processing Plant (Stomachs)	1
Purification Centres (LBM)	2
Re-wrapping Plant (Fish)	1
Total Number of Premises	57

It should be noted that Newry, Mourne & Down has the highest number of approved premises in Northern Ireland and the highest number approved for handling fish and shellfish. This is a constantly changing industry as the processes change and varies according to quotas and availability of fish and shellfish. This subsequently puts further demands on the department as the industry need constant support and advice and the associated workload of new, changing and updating approvals.

This demand is reflected in the additional time given for specialist/complex premises in Appendix 2.

Specialist Premises

The following types of premises require specialist expertise and additional time spend due to the nature of the food produced or the vulnerability of the consumers:

Type of Premises	Number
------------------	--------

Manufacturing including EC Approved premises	186
Hospitals	4
Residential and Nursing Homes	57

The food service acts as Home Authority for food manufacturers in the district on an informal basis. These manufacturers produce a range of foods including spring and bottled water, bakery products, confectionary, meat products, meat preparations, fishery products, sandwiches, salads and desserts, nutritional supplements, spirits, beer, cider and oils. Having such a large and varied manufacturing base places additional demands on the food section and has significant resource implications for the department. Referrals from other local authorities into the activities of these companies form a significant part of the work generated by these premises. In addition, the service works in partnership with the South Eastern and Southern Health & Social Services Board to inspect and offer guidance in relation to Daisy Hill Hospital and The Down Hospital, associated day centres and nursing homes on food related issues.

Fish and Shellfish Premises

Newry, Mourne and Down District Council has the highest number of fishery premises in Northern Ireland. Within this there is a large variety of activities taking place including processing, freezing, depuration, manufacturing vessels, shellfish beds, fishing boats and a fish landing port and a fish market within the area, all which require specialist knowledge and skills to regulate.

The requirement for inspection of fish landings involves an officer attending Kilkeel Fish Market from 7.00 am several times a week. Tidal movement often necessitates sampling of shellfish and water early in the morning or late in the evening. It is our intention to continue to work with our fishing fleet of approximately 160 vessels and complete all routine inspections to build on the work that was completed during 2018 – 2020. During this period, we liaised with enforcement bodies in ROI (Republic of Ireland) and Scotland to ensure that fishing vessels were inspected even when not able to return to their home port of Kilkeel. There is a need for surveillance at Kilkeel and Ardglass due to the large number of vessels, fish markets and approved premises. This aligns with priorities of The Food Standards Agency regarding fish and shellfish premises.

Food Imports

Newry, Mourne and Down District Council in conjunction with DAERA operate a Point of Entry designated by the EU to carry out checks on specific categories of goods at the port of Warrenpoint. Under the Protocol, Northern Ireland is required to maintain regulatory alignment with the EU on the application of Sanitary and Phytosanitary (SPS) measures. SPS goods must only enter Northern Ireland through approved Points

of Entry (POEs), each of which has been designated by the EU to carry out checks on specific categories of goods. As part of this role staff are based at the port in Warrenpoint and carryout checks to any trailers that may be of interest on every Seatruck sailing entering Warrenpoint. During 2023 - 24 staff examined 2074 trailers entering Warrenpoint.

Food Exports

Newry, Mourne and Down District Council Issue Export Health Certificates (EHC) to provide assurance to destination country authorities that certain food and drink products being exported meet as a minimum UK/EU food safety requirement as well as any additional conditions required by the destination authority.

While there is no legal obligation on Newry, Mourne and Down District Council to issue export health certificates and such work sits outside of Statutory Official Control enforcement role under the Food Law Codes of Practice. However, they are issued to promote economic growth and assist businesses to bring products to market. EHCs are issued either formally on behalf of DAERA on UK agreed Official EHCs or on behalf of Newry, Mourne and Down District Council on Council health certificates. Staff issued 262 EHCs in 2023 - 24.

Support Health Attestation (SHAs) are produced by trained and competent EHOs authorised by DAERA for fish and fishery products following the APHA's 'Risk based approach to certification of fishery products. These documents are produced to facilitate trade between NI, GB and EU.

Food Standards

The Council is committed to providing information and advice to businesses and the public on a range of food related issues including for example nutrition, allergies, GM products, salt and fat contents etc.

From 1 October 2021, the requirements for prepacked for direct sale (PPDS) food labelling changed in Northern Ireland. The new labelling will help protect consumers by providing potentially life-saving allergen information on the packaging. Any business that produces PPDS food will be required to label it with the name of the food and a full ingredients list, with the allergenic ingredients emphasised within the list. The food safety section will be involved in raising business awareness and providing support and advice.

Access to the Food Service Section

The Food Service is located at the administrative offices in Newry (Greenbank) and in the Downpatrick Office with contact details as outlined below. The Service also has permanent use of an office at Kilkeel Harbour and Warrenpoint Harbour.

Newry Office:

Greenbank Offices, Greenbank Industrial Estate, Newry, BT34 2QU

Downpatrick Office:

Downshire Civic Centre, Downshire Estate, Ardglass Road, Downpatrick BT30 6GQ

Service users may contact either site or leave a message, in the following ways:

- In person at the either office: Monday – Friday 9am – 5pm
- By telephone, 0330 137 4000 during office hours outlined above. When officers are out of the office a message will be taken by admin staff and calls will be returned as soon as possible
- By e-mail: chealth@nmandd.org

Kilkeel:

Kilkeel Fish Market, The Harbour, Kilkeel. 0330 137 4623

Warrenpoint:

DAERA Facility, Warrenpoint Harbour Authority, The Docks, Warrenpoint, BT34 3JR
02894426824, porthhealth@nmandd.org

Out of Hours Emergency Service

Arrangements are in place within the Council to respond to communicable disease matters and food incidents notified outside normal working hours from the Public Health Agency and the Food Standards Agency. A team comprising of experienced food officers from the Armagh City, Banbridge and Craigavon Borough Council and Newry, Mourne and Down District Council was set up on 1 April 2015. The on-call officer may be contacted by mobile telephone, the number has been made available to all relevant authorities and agencies. This service operates outside normal working hours, at weekends and on statutory holidays.

2.5 Enforcement Policy

In carrying out the activities listed above officers will apply a variety of measures to ensure that individuals and organisations meet their responsibilities. These will include education, negotiation, advice, guidance, the issue of warning letters, formal notices, formal cautions and prosecutions. The Council is committed to the Central/Local Government Concordat on Good Enforcement which encourages and promotes best practice in enforcement. The food service has a food safety and a food standard enforcement policy, which embraces the principles of the Enforcement Concordat. The Council's overall aim is to work in collaboration with businesses avoiding where possible excessive bureaucracy in the way it works. The Council's Enforcement Policy is included in Appendix 3.

SECTION 3 – SERVICE DELIVERY

3.1 Food Premises Inspections

A total of 2321 food premises are subject to programmed food hygiene and food standards inspection. The risk category of premises as defined by Annex 1 of the Food Law Code of Practice (Northern Ireland) determines the interval between inspections. The following diagram shows a breakdown of premises numbers by risk categories for both food hygiene and food standards.

Figure 1: Number of premises by risk category for Food Hygiene

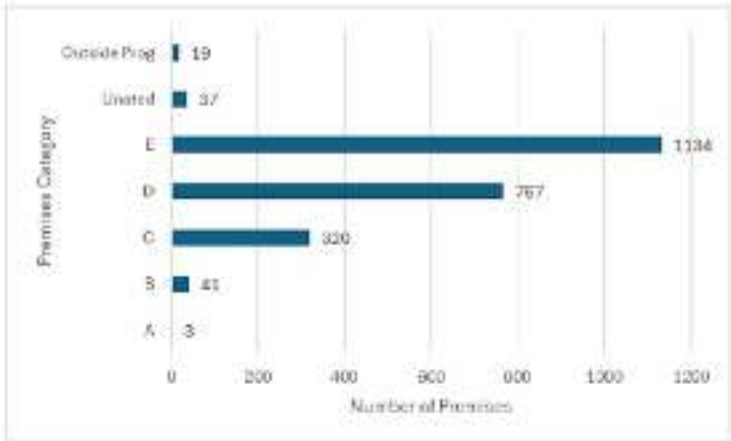
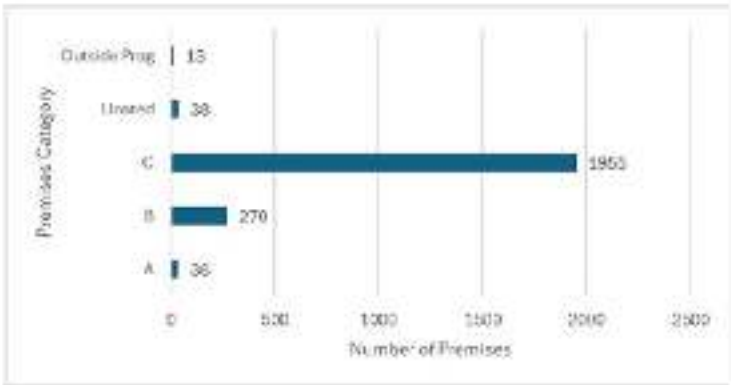


Figure 2: Number of premises by risk category for Food Standards



Inspections are carried out in accordance with the Food Safety (NI) Order 1991 at a minimum frequency as determined by the risk assessment-scoring scheme contained in the Food Law Code of Practice (Northern Ireland), taking into consideration the

alternative enforcement strategy and the broadly compliant issues mentioned above. In addition to the proactive work other visits may be made to food premises following complaints from the public, food poisoning incidents or requests from businesses for information or advice and food hazard warnings.

3.1.1 Food Hygiene

The Council inspects food premises for compliance with relevant legislation according to risk as set out in the FSA approved Code of Practice and, as a result, assess food hygiene and food standards compliance. Appropriate action within the terms of the Council's Enforcement Policies will be taken to remedy any non-compliance discovered. Education and advice will continue to be given on the principles of recently introduced standards concerning hazard analysis.

In order to prioritise resources and to work more efficiently, food hygiene interventions will be completed in premises according to their risk as follows:

Risk Rating	Type of intervention (Official Control)
New business	Inspection or audit within 28 days of opening
A or B	Inspection, Partial Inspection or Audit within 28 days
Non-broadly compliant C	Inspection, Partial Inspection or Audit
Broadly compliant C, D or E (included in FHRS)	Inspection, Partial Inspection, Audit or Verification Visit*
Category D (30/40 for type of food or method of handling)	Inspection, Partial Inspection or Audit
E (not included in FHRS)	Alternate between Inspection, Partial Inspection, Audit or Verification Visit and AES

* Verification visit is only appropriate where the business has achieved a FHRS of 5. The next intervention must be an Inspection, Partial Inspection or Audit

3.1.2 Food Standards

The Council inspects premises for compliance with relevant legislation according to risk as set out in the FSA approved Code of Practice and to work more efficiently, food standards interventions will be completed in premises according to their risk as follows:

Risk Rating	Type of Intervention (Official Control)
New business	Inspection or audit within 28 days of opening
A	Inspection, Partial Inspection or Audit within 28 days
Non-broadly compliant B	Inspection, Partial Inspection or Audit
Broadly compliant B	Appropriate Official Control including Inspection, Partial Inspection, Audit, *Sampling Visit, *Monitoring Visit, *Surveillance Visit or *Verification Visit.
C	Alternate between AES and Inspection, Partial Inspection, Audit, *Sampling Visit, *Monitoring Visit, *Surveillance Visit or *Verification Visit.

* A new risk rating can only be completed following an Inspection, Partial Inspection or Audit. One of these should be completed alternately with other Official Controls.

At present the above intervention frequency is what is being used and has been taken into consideration when completing the food service plan. The implementation of the Food Standards Delivery Model is due to take place before the end of March 2025, and this will change the risk categories, the type of interventions to be undertaken and the frequencies. At present it is not possible to predict the impact this will have on the number of interventions that will have to be undertaken. Prior to the FSDM being implemented there will be work required in the form of a data cleanse of tascomi to ensure that conversion to the new risk rating is accurate. There will also be staff training for officers and admin staff, review and update of inspection forms and procedures. It is difficult to anticipate the actual time spend to undertake the implementation of the FSDM.

3.2 Food Service Work Plan 2024-25

The total time (in hours) to complete the number of tasks required to meet the demands of the food service are outlined in the following table. The details of the number of interventions and actions required to complete the work are detailed in Appendix 2, including a breakdown of required tasks necessary to complete planned work, response work, sampling, service management and health and wellbeing promotion. Individual task times based on previous research are also outlined in Appendix 2 which when multiplied by number of tasks can give an indication on the number of hours, including administration required to meet the demands of the food service. This includes the planned work for 2024-25 and any backlog of inspections outstanding from the previous year.

Planned Work

Activity	Total Hours
Planned Food Hygiene inspections	2250
Outstanding Planned Food Hygiene inspections	1515
Planned Food Standards inspections	1631
Outstanding Planned Food Standards inspections	856
FHRS Sticker Display Checks	287
EC approved Premises	2280
Home Authority Premises work (additional to planned inspections)	630
Hospitals	40
Fish Market	144
Export certificates	917
Port Health / BCP	3112
TOTAL	13,662

Responsive Work

Activity	Total Hours
Revisits (food hygiene)	225
Revisits (food standards)	200
FHRS (Revisits, Appeals, Right to Reply)	52
Food Complaints	570
Food Premises Complaints	58
Home Authority Complaints	50
Advice to businesses	1480
Food related Infectious Disease	435
Food Safety Incidents	390
Food Alerts	120
Formal Action	384
FHRS Enforcement	120
TOTAL	4084

Sampling

Activity	Total Hours
Microbiological Sampling	763.5
Chemical Sampling	288
Shellfish Sampling	553
TOTAL	1604.5

Health & Wellbeing Promotion

Activity	Total Hours
Food Safety Training	42
Food Safety & Standards Promotion	420
TOTAL	462

Service Management

Activity	Total Hours
Food Service Planning, Monitoring & Review	496
Food meetings & procedures/policy development	954
Port Health Meetings	208
Trust Meetings	10
Food Safety & Standards Research, Personal Development & Competency Assessment	992
TOTAL	2660

3.3 Summary of Time spend required for Food Service Plan

Tasks	Time (Hours)
Planned Work	13662
Responsive work	4084
Sampling	1604.5
Health & Wellbeing Promotion	462
Service Management	2660
TOTAL TIME REQUIRED	22472.5

SECTION 4. RESOURCES

4.1 Financial Allocation

A generic costs framework for food safety provides a method to determine attributable overheads to the food function and a multiplier for employee costs based on the English Eleven Cities system of cost centres.

4.2 Staffing Allocation

The structure of the food service and information on officers' roles was detailed in Section 3.2 of this plan. Detailed below is a list of officers working in Food Law enforcement and related matters.

Food Service Delivery Staff	Area	% Time	FTE
Head of EH (Commercial)	Going through recruitment	50	0.5
Senior EHO (Food Safety - General)	Area 3	90	1
EHO	Area 1	90	1
EHO	Area 7	90	1
EHO	Area 5	90	1
EHO	Area 8	90	1
EHO	Area 6	45	0.5
EHO	Area 4	60	0.6
EHO	Area 6	45	0.5
EHO (Redeployment)	Area 2		0.6
Senior EHO (Imports/Exports/Port Health)		90	1
EHO (Port Health)		75	0.85
EHO (Port Health)		90	1
EHO (Port Health)		45	0.5
Technical Officer		35	0.4
Technical Officer		55	0.6
Administrative Assistant		60	0.6
Administrative Assistant		60	0.6

Trained and competent EHOs also provide standby cover and overtime at the port for planned and unplanned leave and additional demands as they arise.

The current staff are suitably qualified, experienced and competent to carry out the range of tasks and duties they are authorised to perform as required by of Food Law Code of Practice (Northern Ireland). Each officer is empowered to carry out all Council functions under the Order. The full time equivalent of staff delivering the Service Plan should be 13.25. There are currently only 12.25 full time equivalent staff.

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With 1606 hours being the accepted annual hours available per officer, 14 full-time equivalent officers are required to complete the work outlined in this plan.

SECTION 5 – QUALITY ASSESSMENT

5.1 Quality Assessment

Quality Assessment has been undertaken for all Environmental Health functions. To ensure a consistent approach by staff the Head of Environmental Health (Commercial) and Senior EHOs carry out monitoring and management checks on food examination/analysis results, food complaints, food inspection and reports, food poisoning investigations, examines workload distribution and sampling programmes and institution of formal enforcement action and will carry out accompanied inspections as outlined in the Council's internal monitoring procedure. The Assistant Director reviews performance at Management meetings.

SECTION 6 REVIEW

6.1 Review against Service plan

The process of review will include the following:

- 6 weekly reviews at team meetings
- Quarterly management review in association with Food Standards Agency returns
- Annual report to Council against plan.

6.2 Identification of any variation from the Service Plan

The aim of the review will be to identify any variance from the Service Plan and where appropriate the reasons for the variance.

6.3 Areas of Improvement

The Assistant Director of Environment will set in a report for actions to the Council any relevant improvement plan or service development identified as necessary by the review or the quality assessment.

6.4 Measuring Objectives

The objectives set out above will be measured and evaluated in accordance with the following table of targets. Where deviations from the anticipated target levels are found to be developing, the work of the Food Service will be analysed in more detail and changes put in place to ensure that the priorities of economic improvement are delivered.

ACTIVITY	TARGET
Inspection of Food Premises to assess compliance with food hygiene legislation	100% of new businesses 100% of A and B risk rated premises inspected. 100% of non-broadly complaint C risk rated premises inspected
Inspection of Food Premises to assess compliance with Food Standards legislation	100% of new businesses 100% of risk A and non-broadly complaint B premises inspected annually.
Implement the Food Hygiene Rating Scheme	Issue Food Hygiene Rating Scheme certificates in accordance with the FSA's FHRS Guidance.
Issue of statutory Notices, except for emergency notices.	90% of notices issued within 5 working days of premises inspections
Issue of emergency notices	100% of notices within 1 working day of premises inspections
Complaints, requests for service, responses to queries, and food alerts for information	100% responded to within 3 working days
Food Alerts for action	100% responded to within 3 working days.
Chemical sampling	10 chemical foods per month
Microbiological samples	56 micro samples per month

Appendix 1

The Council liaises with the following range of organisations:

Public Health Laboratories	FSA	APHA
Public Analyst	PSNI	Home Office – Immigration Services
Eurofins Scientific (Ireland)	Loughs Agency	AFBI
SHSST	Public Health Agency	EA
DAERA	SESCT	Border Force
NRPB	NIEA	HMRC
FSA (NI)	Trading Standards	

Access to specialist advice is also available from:

Seafish	LACORS	CIEH
Colindale (PHLS)	FSPB	FSAI
Campden & Chorley	Belfast City Council Legal Serv.	Various Websites

APPENDIX 2

During the year 2024 -25 the planned number of inspections is as follows: -

Food Hygiene

The work activity in respect to food hygiene inspections and an estimate of the time spend on inspections and associated administration is shown in the following table.

Risk Category	Frequency	No of premises in this category	No. of Tasks due in 2024/25	Task Time	Total Hours
A	6 Mths	3	3	7	21
B	1 Yr.	41	38	6	228
C	18 Mths	320	189	4	756
D	2 Yrs.	767	279	3	837
E	3 Yrs.	1134	134	2	268
Currently Unrated	as arising	37	35	4	140
Outside Program	—	19	—	—	—
TOTAL		2321	678		2250

Outstanding Food Hygiene Inspections 2023/24

Risk Category	Frequency	No. of Tasks due in 2024/25	Task Time	Total Hours
A	6 Months	0	7	0
B	1 Year	2	6	12
C	18 Months	29	4	116
D	2 Years	133	3	399
E	3 Years	484	2	968
Currently unrated	as arising	5	4	20
TOTAL		653		1515

Food Standards

The work activity in respect to food standards inspections and an estimate of the time spend on inspections and associated administration is shown in the table below.

Risk Category	Frequency	No of premises in this category	No. of Tasks due in 2023/24	Task Time	Total Hours
A	1 Year	36	34	7.5	255
B	2 Years	270	113	3.5	395.5
C	5 Years	1955	354	2.5	885
Currently unrated	As arising	38	38	2.5	95
Outside program	-	13	-	-	-
TOTAL		2312	531		1630.5

Outstanding Food Standards Inspections

Risk Category	Frequency	No. of Tasks due in 2023/24	Task Time	Total Hours
A	1 Year	0	7.5	0
B	2 Years	24	3.5	84
C	5 Years	304	2.5	760
Currently unrated	As arising	5	2.5	12.5
TOTAL		336		856.5

Estimated Revisits

Premises which are not 'Broadly Compliant' will be subject to follow-up action including a revisit to secure compliance with the requirements. The work activity in respect to inspections and an estimate of the time spend on re-visits and associated administration is shown in the following table:

	Number expected	Task Time	Total Time
Food Hygiene	150	1.5	225
Food Standards	100	2	200

Note. There were 172 FH & 135 FS revisits undertaken in 2023/24,

FHRS Revisits and Appeals

There are **1741** premises included in Food Hygiene Rating Scheme.

	No of Tasks	Task Time (Hrs) Per Visit	Total Hours
Requested Revisit	15	3	45
Appeal	2	3	6
Right to Reply	2	0.5	1
TOTAL			52

1741 premises are included in the mandatory Food Hygiene Rating Scheme within Newry, Mourne and Down District Council. We aim to visit and check compliance within 50% of these premises in 2024 - 25.

No. of visits planned	Task Time (Hrs)	Total Time (Hrs)
870	0.33	287

Non-compliance with the requirement to accurately display a valid rating, can, following a graduated enforcement approach, lead to the issuing of a warning letter and/or a Fixed Penalty Notice (FPN), the anticipated time spend including revisit for compliance checks for these tasks is outlined in the table below.

Task	No. of expected tasks	Task Time (Hrs)	Total Time
Warning letter	100	1	100
Fixed penalty notice	20	1	20
Total			120

Specialist/Complex Premises

Additional time spend for both hygiene and standards visits for more specialist/complex premises is detailed below.

Specialist Area	No. of Premises/ Tasks	Expected Time Spend	Total Hours
EC Approved premises	57	40hrs each	2280
Other Manufacturer (Home Authority)	63	10hrs each	630
Hospital	4	10hrs each	40
Fish Market Inspection	96 (8 x / Month)	1.5 hrs each	144
Issuing Export Certificates	262	3.5hrs each	917
Total			4011

Port Health / BCP Checks

Area	Number of Tasks	Expected Time Spend	Total Hours
Port Health including Manifest checks	11 per week (572)	4.5hrs	2574
Standby shift covered by Food EHO	115 per year	4.5	517.5
Ship Sanitation Certification	5 per year	4	20
Total			3111.50

Food complaints

Authorised officers assess all food complaints upon receipt and in circumstances where a need has been identified commence investigations in accordance with the NIFLG Food Complaints Investigation Procedure.

Where appropriate, food complaints are referred to the Originating/Home Authority for investigation. The likely demands on the service are based on trends in the past two years as detailed below.

No. of Food Complaints	Task Time	Total Hours
57	10.0	570

Officers will also investigate referrals or complaints from members of the public concerning observed alleged poor hygienic practices or standards within food premises. If necessary, appropriate action will be taken in accordance with the Council's enforcement policy.

Again, based on the last two years the likely demand will be as set out below.

No of Food Premises Complaints	Task time	Total hours
29	2.0	58

Home Authority Principle

The Council implement the approved Home Authority Policy and Procedure. It is estimated that for these premises additional resources will be required as set out below.

No. of Home Authority Premises (Informal)	Task Time (hrs)	Total Hrs
10	5.0	50

Formal Action

Legal actions including court proceedings can be initiated following both routine inspection-based activities and reactive visits following complaints or food incidents.

Task	No of Tasks	Task Time (hrs)	Total Hours
Improvement Notices	10	2	20
Remedial Action Notices	5	2	10
Detention/Seizure of food	10	4	40
Voluntary Surrender of food	10	6	60
Emergency Closure	2	14	28
Voluntary Closure	2	2	4
Formal Caution	4	10	40
PACE interview	4	8	32
Prosecution	3	40	120
TARP Notices	4	2	8
Organic Notices	2	2	4
OFFC (HRFNAO)	6	2	12
Plastic Kitchenware (Conditions on Imports from China)	3	2	6
TOTAL			384

Sampling

We have implemented the approved chemical and microbiological sampling policies and programmes in accordance with NIFLG document – Food Sampling Policies and Associated Guidance and are in the process of developing food sampling plans for the new Council.

The Public Health Laboratory Service at Belfast City Hospital carries out the microbiological examination of food and water samples submitted on behalf of the Council. Public Analyst Scientific Services Ltd is the appointed Public Analyst to carry out chemical analysis of food samples procured by our officers.

Water samples are collected from commercial and domestic public and private water supplies in addition to recreational water supplies such as swimming and spa pools.

Microbiological Sampling Programme

Task	No of Tasks	Task Time (hrs)	Total Hours
Food sampling	718	0.75	538.5
Water sampling (drinking & recreational)	300	0.75	225
TOTAL			763.5

It should be noted that the Loughs Agency are contracted by the FSA to uplift shellfish and seawater samples in the former Newry & Mourne District Council area. While in the former Down District Council area shellfish samples are collected by the Council's Technical Officers, at the following locations: Dundrum Bay North, Dundrum Bay South and Killough.

Task	No of Tasks	Task Time (hrs)	Total Hours
Coordinating and planning shellfish sampling with FSA / Labs	4	4	16
Flesh Sampling	42	10 (2 officer 6hrs / 4 hrs)	420
Water Sampling	26	4.5 (1 officer)	117
TOTAL			553

Chemical Sampling Programme

Task	No of Tasks	Task Time (hrs)	Total Hours
Formal sampling	24	2.0	48
Informal sampling	150	1.0	150
Wild Caught Fish	60	1.5	90
TOTAL			288

Actions are taken as detailed in the enforcement policies where sampling results are not considered satisfactory.

Control and investigation of outbreaks of food related infectious disease.

The Council will investigate all outbreaks, sporadic incidents and alleged cases of food and water related infectious diseases in accordance with Public Health Agency's (PHA) procedures using the guidelines for the investigation of food and water borne diseases.

The aim of any investigation is to assist the PHA to:

- Contain the spread of infection
- Trace the source of infection
- Identify the causative organism/chemical
- Trace carriers and cases
- Identify the focus in infection
- Recommend practices to prevent recurrence of disease.

Whilst it is difficult to predict the demand on resources arising trends over the past two years would indicate a time spend of 60 hrs per outbreak investigation and 3hrs for each sporadic case This may increase appreciably depending on the scale of any outbreak or need for enforcement action arising from investigation.

Task	No of Tasks	Task Time (hrs)	Total Hours
Potential Outbreaks	1	60	60
Sporadic cases	125	3	375
TOTAL			435

Food Safety Incidents

The number of food safety incidents arising within the district area has increased significantly over the last number of years. Resources are required to react to incidents related to food fraud or criminality either immediately or through a pre-planned multi-agency approach.

Predicted time spend for dealing with incidents is:

Task	No of Tasks	Task Time (hrs)	Total Hours
Major incidents	4	60	240
Minor Incidents	15	10	150
TOTAL			390

Food Alerts for Action

Task	No of Tasks	Task Time (hrs)	Total Hours
FAFA	20	6	120
TOTAL			120

Advice to businesses

We are committed to working with businesses to ensure that technical advice is available to help them comply with the law and to encourage the use of best practice. We achieve this using several measures including:

- Targeted Food Safety update seminars for food businesses.
- Advice given through the course of inspections and other visits.
- Responding to requests and enquires.
- Distribution of literature to businesses giving guidance on specific and topical issues.
- Development and delivery of a business start-up advisory programme in conjunction with the Economic Development Department.

The likely demand on the service is based on trends in the past two years and is detailed below:

Task	No of Tasks	Task Time (hrs)	Total Hours
Advisory visits	350	2	700
Advisory Telephone Calls	3000	0.25	750
Business Start-Up Advisory Programme	6	5.0	30
TOTAL			1480

Food Safety Training

The Department has a long-standing partnership with the Southern Regional College and the South Eastern Regional College in the provision of training in food safety. Whilst this has diminished over the last year in terms of providing staff to deliver accredited food hygiene training, Environmental Health Officers still provide training for Catering Students at both Colleges on the Food Safety Management tool, 'Safe Catering'.

Task	No of Tasks	Task Time (hrs)	Total Hours
Catering Students training	2	6	12
Secondary School Career Talks	10	3	30
TOTAL			42

Food Safety & Standards Promotion

The Council recognises the importance of promoting food safety and food standards. The following promotional activities will be undertaken:

Task	Total Hours
PPDS awareness/advice	50 hrs
Potential nutrition advice	200 hrs
Council Web Site	20 hrs
Targeted Seminars – Chinese Seminars and further allergen in 2024/25	150 hrs
TOTAL	420 hrs

It is anticipated that in line with Corporate Objectives there will be a renewed focus on some of the work completed with businesses in the past looking at the nutritional value of foods provided to consumers. Officers trained in nutrition are qualified to analyse menus and discuss the provision of healthier, more nutritious options from interested businesses.

Food Service Planning and Review

The food service provision is planned for through the development of this plan and by measuring the actual performance against planned work while considering priority work which is not planned for such as food incidents. The FSA require Councils to make a yearly LAEMS return and to complete the Best Value Matrix.

Food sampling plans also are needed and need to be kept updated and reviewed considering emerging issues.

Internal monitoring is necessary to achieve consistency in approach both during inspections and when applying the risk rating scores as outlined in the Food Law Code of Practice and Practice Guidance documents. This necessitates accompanied monitoring visits and file reviews, the frequency of which depends on the Officers experience and the type of premises being inspected. Authorisations of Environmental Health Officers are competency based and internal monitoring is used as a tool for measuring levels of competency.

The accuracy of data needs to be checked to ensure the yearly return is meaningful and time is also needed to complete and check the accuracy of the fortnightly upload of data to the FHRS web-based portal.

Frequently Freedom of Information requests are made and must be responded to in line with Council policy.

Task	No of Tasks	Task Time (hrs)	Total Hours
Food Service plan	1	60	60
Food sampling plan	2	10	20
End of year return to FSA	1	40	40
Mid – Year Return to FSA	1	40	40
FSA returns	10	3	30
Internal Monitoring File reviews	192	0.5	96
Internal Monitoring Accompanied visits	16	4	64
FHRS Upload	26	1	26
FOI Requests	12	10	120
TOTAL			496

Liaison with other organisations

To ensure that food enforcement actions are in line with The FSA's Framework Agreement, Code of Practice and Practice Guidance and the FHRS Implementation Practice Guidance and that we are consistent with those of neighbouring Councils. The Northern Ireland Food Managers Group (NIFMG) comprises of Senior or Principal Officers from each council area and a representative from the FSA (NI). Other UK wide consistency is clear when for example FSA (NI) and CDSC (NI) representatives from PHL etc address this group on common issues within the food function. Sub-groups from NIFMG look at specific issues such as Food Standards, FHRS, FSS (web-based sampling database) and Shellfish.

Cooperation also exists on an all-Ireland basis, examples of this include

- a) Saferfood - the Food Safety Promotion Board and
- b) Addressing Communicable Disease Control involving amongst others PHA, SHSCT, SEHSCT, other district councils and appropriate bodies in the Republic of Ireland.

It is expected that to achieve consistency across the council area the Senior Environmental Health Officers will meet on a regular basis and will continue to hold bi-monthly team meetings, alongside Food Officer Group meetings which will look at specific issues including consistency checks. Management team meetings will also continue a regular basis with the Assistant Director of Health & Well-being.

General

Task	No of Tasks	Task Time (hrs)	Total Hours
Senior Officers Meeting	12	4 (3 Officers to attend)	144
Departmental Team Meetings	2	3 (15 Officers to attend)	90
Food Officer Group	6	4 (15 Officers to attend)	360
Northern Ireland Food managers' meetings and subgroup meetings (NIFMG, FSFF, Imports/Exports, UKFSS, FSA Approvals,	24	10	240
Management Team Meetings	12	3 (1 Officers to attend)	36
Policy & Procedure Review & Development	12	7	84
TOTAL			954

Associated with Port Health and Operating the BCP

Task	No of Tasks	Task Time (hrs)	Total Hours
FSA / DC Meeting	24	1	24
BCP Meeting	6	2 (8 officers to attend)	96
CHIP	25	0.75	18.75
DEFRA Organics	12	0.5	6
Infrastructure and Design	12	1	12
DEFRA / FSA / LA	12	1	12
Port Security	2	2	4
User Engagement	12	1	12
Port Welfare Committee	4	3	12
PHA (Cruise ships etc)	4	1.5	6
APHA NI Ports	3	1.5	4.5
TOTAL			207.5

Other meetings that are regularly attended by the food safety team are consistency meetings held with both Trusts.

Task	No of Tasks	Task Time (hrs)	Total Hours
Trust meetings	5	2	10
TOTAL			10

Food Safety & Standards Research & Personal Development

Officers must keep abreast of current developments and to be familiar with the specific processes that they are inspecting/auditing to be deemed competent and to maintain their level of authorisation. This will also require the attendance of various relevant courses throughout the year. In addition, each officer must complete a Competency Assessment in line with the FSA’s Food Law Code of Practice and Practice Guidance and to have this assessment evaluated by their line manager.

Task	No of Tasks	Task Time (hrs)	Total Hours
Food safety & standards research	16	10	160
Food safety training	16	40	640
Competency Assessments	16	12	192
TOTAL			992

APPENDIX 3

Council’s Enforcement Policy

Enforcement policy	Newry, Mourne and Down
<i>Policy Title</i>	Generic Enforcement policy - Environmental Health Functions

Policy Summary

This is a generic policy designed to allow the most appropriate enforcement option to be chosen based on principles that promote consistency and fairness. The appendices to this policy provide topic specific information which will assist in its application.

Requirement for policy

The policy is required to determine the most appropriate action from a stated range of options in relation to breaches of legislation across the range of Environmental Health functions

Contents

Topic	See Page
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General Principles	2
Criteria to determine most appropriate choice of enforcement action	3
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Who/What does this policy apply to	All staff who make enforcement decisions or recommendations on legislation that the Council enforces across all services and all departments.
What are the key controls	<div><div>1. Enforcement principles from the European Enforcement Concordat, which are,<ul style="list-style-type: none">• Proportionality• Consistency• Targeting• Transparency</div><div>2. Regulators Compliance Code and</div><div>3. The Code for Crown Prosecutors.</div><div>4. The council recognises the role of Primary Authorities established under the Regulatory Enforcement and Sanctions Act 2008 and will adhere to the arrangements within the memorandum of understanding agreed between CEHOG and the Better Regulation Delivery Office (BRDO).</div></div>

General Principles

- 1. Council officers will assist businesses and individuals to understand their legal requirements and the obligations these impose
- 2. The Council (via its authorised officers) will endeavor to secure compliance with the law within its remit. This will entail officers using a range of enforcement actions, both formal and informal.
- 3. Enforcement actions will be informed by -
 - **Proportionality** in applying the law and securing compliance, (Proportionality means relating enforcement action to the risks and costs).
 - **Consistency of approach**, (Consistency means taking a similar approach in similar circumstances to achieve similar ends).
 - **Targeting of enforcement action**, (Targeting means that actions are directed primarily to need - activities which give rise to the most serious risks or where hazards are least well controlled).
 - **Transparency** about how the Council operates and what its customers may expect. (Transparency means helping duty holders and others to understand what is expected of them and of the Council. It also means making clear why an officer intends to, or has taken enforcement action.

Criteria to determine choice of enforcement action

- All the circumstances of an alleged offence will be taken into consideration when deciding the choice of enforcement action including -
- the seriousness of the alleged offence,
 - whether the alleged offence is fraudulent, intentional, negligent or persistent,
 - the threat posed,
 - the probable public benefit,
 - the strength of evidence,
 - the strength of any statutory defences,
 - the previous history of the party concerned,
 - the willingness of the party to prevent a recurrence of the problem, and
 - the appropriateness of alternative actions.

Enforcement Actions	<p>Enforcement actions, if any, will be determined in accordance with the above principles, from the following informal and, where statute permits, formal options -</p> <ul style="list-style-type: none"> • oral advice • advisory or warning letter • enforcement notice • sampling/test purchase; seizure; rendering harmless; • formal caution • fixed penalty • prosecution
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***Juveniles
(persons
under the
age of
eighteen)***

The rights and welfare of the child will always be of paramount importance when considering any course of action. This approach reflects the paramountcy principle enshrined in the Children (N1) Order 1995.

Where an offence as detailed within the legislation contained in appendix one, has been committed by a person under the age of eighteen the taking of formal enforcement action (enforcement notice, seizure, rendering harmless, formal caution, fixed penalty and prosecution) shall only be undertaken in exceptional circumstances, namely:-

The offender has committed similar previous offences

The offender acts in an abusive, aggressive and/or obstructive manner when approached by an officer of the council.

Where a person under eighteen is believed to have committed an offence under the relevant legislation (see appendix one) but formal enforcement action is not to be taken then the following steps shall be employed, where possible -
formally write to the young person outlining details of their actions, that an offence appears to have been committed and that further offences committed may result in action including, depending on the seriousness of the offence, the following:

Formal written warnings/caution
Acceptable Behaviour contracts
Anti-social Behaviour Orders
Fixed Penalty Notice
Prosecution

or a combination of two or more of the above, write, where the information is available, to the young person's parents or guardians outlining details of the officer's contact with the young person and providing a copy of any correspondence sent to that young person in relation to the matter.

An officer when approaching a person but in particular when approaching a juvenile shall have regard to relevant operational arrangements and procedures.

**Appendix 1.
Additional
information
relating to
enforcement
of Food
Safety and
Food
Standards.**

In deciding whether to prosecute, the Council accepts that it will be guided by the Food Law Code of Practice (Northern Ireland).

To achieve and maintain consistency, the Council will follow the guidance in statutory Codes of Practice, LACORS Circulars and advice offered in relation to BRDO principles in respect of Primary Authorities where appropriate.

Informal Action

The Council recognises informal action as one means to secure compliance with Food Law. In this context, informal action includes offering advice, verbal warnings and requests for action, the use of letters and the issue of food hygiene inspection reports, including those generated on a premises following an inspection. Informal action should be considered in any of the following circumstances:

the act or omission is not serious enough to warrant formal action

from the Food Business Operator's past history, it can be reasonably expected that informal action will achieve compliance

confidence in the Food Business Operator's management involved is high

the consequences of non-compliance will not pose a significant risk to public health

in all circumstances where the Food Law Code of Practice NI suggest that informal action may be an appropriate action.

The authorised officer will ensure that inspection reports will be issued following all programmed inspections even in those circumstances where conditions at the time of inspection are satisfactory. The content of such reports will be as directed in the Food Law Code of Practice NI.

The Council recognises the importance of clear differentiation between legal requirements and matters which are recommended as good hygiene practice in all written or verbal advice given to food businesses.

Hygiene Improvement Notices

The Council recognises that authorised officers of the Council may serve Hygiene Improvement Notices. The Council considers that Hygiene Improvement Notices are appropriate where one or more of the following criteria apply:
there are significant contraventions of legislation

there is a lack of confidence in the proprietor or enterprise to respond to an informal approach

there is a history of non-compliance with informal action

standards are generally poor with little management awareness of statutory requirements

the consequences of non-compliance could be potentially serious to public health although it is intended to prosecute, effective action also needs to be taken as quickly as possible to remedy conditions that are serious or deteriorating.

Hygiene Improvement Notices issued by officers of the Council should, in general, be related to risk to health. It is not, for example, appropriate to issue Improvement Notices for minor technical contraventions.

Only officers specifically authorised to do so may serve Hygiene Improvement Notices on behalf of the Council. A/FC/POL/001/02

The Council accepts all relevant guidance in statutory Codes of Practice and LACORS Guidance Notes on the use of statutory notices.

The Council accepts that a Hygiene Improvement Notice is a legal document and as such it confirms that failure to comply with a Hygiene Improvement Notice will in general result in court proceedings. The Council accepts that other bodies such as primary, home and originating authorities will be advised of formal action taken by the Council and its outcome.

Hygiene Emergency Prohibition Notices

The Council accepts that from time to time the service of Hygiene Emergency Prohibition Notices may be necessary but only in one or more of the following circumstances:

the consequences of not taking immediate and decisive action to protect public health would be unacceptable

an imminent risk to injury to health can be demonstrated. This might include evidence from relevant experts, including a food analyst or food examiner

the guidance criteria, specified in the relevant statutory Code of Practice, concerning the conditions where prohibition may be appropriate, are fulfilled

there is no confidence in the integrity of an offer made by a proprietor voluntarily to close premises or cease the use of any equipment, process or treatment associated with the imminent risk

a proprietor is unwilling to confirm in writing his/her offer of a voluntary prohibition

Only officers specifically authorised to do so may serve Hygiene Emergency Prohibition Notices for the Council. The Council further recognises the need for such officers to have considerable experience in a variety of food safety enforcement situations. A/FC/POL/001/02

The Council accepts the guidance on Hygiene Emergency Prohibition Notices contained in the Food Law Code of Practice NI.

The Council recognises that other bodies such as home and originating authorities will require to be advised of formal action taken by the Council and its outcome.

Expert Advice will be sought where the process or treatment requires specialist knowledge or qualifications to establish that the health risk conditions above are met.

Remedial Action Notices.

The use of Remedial Action Notices in Northern Ireland was extended to all types of food businesses on 6th April 2012. Prior to that date they could only be used in respect of product specific establishments subject to approval under regulation 853/2004.

In addition to the other enforcement options available, the service of a Remedial Action Notice allows for prohibition of the use of equipment or any part of the establishment, the cessation or reduction of activities, or the detention of food of animal origin for the purposes of examination.

Only a specifically authorised officer with detailed knowledge of enforcement will sign a Remedial Action Notice.

Circumstances which might lead to the issue of a Remedial Action Notice include:

the failure of any equipment or part of an establishment to comply with the requirements of the "Hygiene Regulations"

the need to impose conditions upon, or the prohibition of the carrying on of, any process breaching the requirements of the regulations or hampering adequate health inspection in accordance with the Regulations.

where the rate of operation of the business is detrimental to its ability to comply with the Regulations.

As soon as an officer is satisfied that the matters specified in the Remedial Action Notice have been complied with, they will issue a notice of withdrawal. A/FC/POL/001/02

Voluntary Closure.

There may be occasions where, although an authorised officer is satisfied that conditions within a premises merit the use of emergency prohibition procedures, the proprietor of the food business offers to close voluntarily until the health risk is removed.

These offers can be accepted in the following circumstances:

the authorised officer is satisfied that there is no likelihood of the premises being used as a food business, or of the use of equipment, or of a process without the express agreement of this authority during the time of voluntary closure;

the offer to close and its acceptance must be fully documented and signed by the proprietor of the food business and by specifically authorised officers;

In respect of a Hygiene Emergency Prohibition Notice, the person making the offer of closure is aware that in closing voluntarily they are giving up their right to compensation for unjustified action contained in formal emergency prohibition notice procedure.

Revocation of Approvals under EC Reg. 853 and 854.

Food businesses that produce, process or export foods containing meat, poultry, dairy and egg products, which are not takeaway foods, for sale in a retail shop have to be officially approved before they can trade.

These premises are subject to the same enforcement procedures as outlined in this Policy but in addition will have their approval to trade withdrawn if they have been made the subject of a prohibition order or hygiene emergency prohibition order and have effectively ceased to trade.

Seizure or Detention of Food.

Circumstances which might lead to the issue of a Detention Notice include those where there are indications or suspicions that food is unsafe because of breaches of the requirements of the Hygiene Regulations.

If upon inspection of any food intended for human consumption an officer has reasonable grounds for suspecting that food does not satisfy food safety requirements for reasons of hygiene, or can certify that it has not been produced, processed or distributed in compliance with the relevant regulations, they may detain and/or seize the food. Only specifically authorised environmental health officers will be able to seize or detain food and this will only happen, unless circumstances

require immediate action, after discussion with the owner or person in charge of the food and if appropriate with the manufacturer. As soon as the officer is satisfied that the food has been found not to be unsafe, they will issue a notice of withdrawal.

Voluntary Surrender

In certain circumstances it may be appropriate in order to remove unsound, unfit or poor quality food from circulation to facilitate the use of voluntary surrender of food from a food business operator. In these cases an authorised officer from the Service will supervise the removal and destruction of the food and will issue a certificate confirming its disposal, subject to an administrative fee.

Prosecution

In general, the Council will restrict prosecution to those persons who blatantly disregard the law, refuse to achieve even the basic minimum legal requirements, often following previous contact with the Council, and who put the public at serious risk.

The circumstances which are likely to warrant prosecution may be characterised by one of the following:

where the alleged offence involves a flagrant breach of the law such that public health, safety or well-being is or has been put at risk

where the alleged offence involves a failure by the suspected offender to correct an identified serious potential risk to food safety having been given a reasonable opportunity to comply with the lawful requirements of an authorised officer where the offence involves a failure to comply in full or in part with the requirements of a statutory notice

where there is a history of similar offences relating to risk to public health

where the previous use of informal action in relation to similar offences has not secured compliance.

Before proceeding with a prosecution, the Council must be satisfied that there is relevant, admissible, substantial and reliable evidence that an offence has been committed by an identifiable person or company. The Council must be satisfied that there is sufficient evidence to provide a realistic prospect of conviction. The Council must also be satisfied that it is in the public's interest to prosecute and in this context it will consider guidance contained in the Code for Crown Prosecutors.

In deciding on whether to prosecute, the Council will take into account all the factors in the Food Law Code of Practice NI.

The Council notes that a court must impose a Hygiene Prohibition Order following certain convictions if it is satisfied that there is a risk of injury to health. The authorised officers of the Council will be required to make available to the court all information necessary for the court to come to an appropriate decision regarding the existence of a risk of injury to health.

The Council recognises that other bodies such as primary, home and originating authorities will require to be advised of prosecutions taken by the Council and their outcome.

Formal Cautions

The Council notes that the Food Law Code of Practice NI advises that Councils should consider issuing a formal caution as an alternative to prosecution.

The Council notes the current Home Office advice which states that the purpose of the formal caution is

- to deal quickly and simply with less serious offences

- to divert less serious offences away from the courts

In relation to food offences, the cautioning officers for the Council will be the Director, the Head of Health and Wellbeing, the Senior Food Officer and any other senior officer who may be so authorised by the Council on the recommendation of the Director.

The Council accepts that the following conditions should be fulfilled before a caution is administered:

- there must be evidence of the suspected offender's guilt sufficient to give a realistic prospect of conviction

- the suspected offender must admit the offence

- the suspected offender must understand the significance of a formal caution and give an informed consent to being cautioned

Where a person declines the offer of a formal caution, the Council will consider taking alternative enforcement action. This will usually take the form of prosecution.

The Council recognises that other bodies such as primary, home and originating authorities will require to be advised of formal cautions taken by the Council and their outcome.

In relation to Food Standards Offences, the Office of Fair Trading shall be notified of any formal cautions issued as soon as possible using the notification procedure as detailed by the Home Office.

Council Owned Premises

Whilst it is not usually the case for enforcement agencies to inspect their own outlets, this could be the case in respect of food enforcement within Council owned premises. Inspection is undertaken by the Council's food safety officers and Council owned premises are required to be registered and meet the same standards as other premises. Where serious contraventions of the regulations are found relevant Director will be advised in writing without undue delay.

**Appendix 2.
Additional
information
relating to
enforcement
of the
Health &
Safety at
Work (NI)
Order 1978**

- (a) an **improvement notice** may be served in any or all of the following cases:-
- where there is a serious contravention which can be improved
 - where an enforcement letter or other previous advice has not been complied with
 - where the previous record of the company or the attitude of the employer would indicate that informal methods are not likely to be effective.
- (b) a **prohibition notice** may be served where there is a risk of serious personal injury. Where the risk is imminent the prohibition notice can have immediate effect or in other cases a prohibition notice can specify a date after which the activity in question must cease.

Prosecution is warranted when, for example:-

- there is serious and blatant disregard for the law which exposes persons to a risk of serious personal injury
- there is failure to comply with an improvement or prohibition notice
- an accident has resulted from a serious contravention of the law which was foreseeable
- there are grounds for believing that the offence is likely to be continued or repeated.
- the company has repeatedly breached legal requirements and it appears that management is not willing to deal adequately with these.
- there is a contravention and the company has received previous warnings about similar offences
- where a particular type of offence is prevalent in an activity or an area

Prosecution on Indictment - A recommendation for prosecution on indictment will only be made after taking legal advice, in cases where:-

- the gravity of the offence would warrant it
- there was blatant disregard for the law
- the powers of the summary court to punish the offence are inadequate
- the offender has a previous record of health and safety convictions
- the offender has not responded to previous warnings
- where there is great public alarm

Manslaughter- where there has been a work-related death, officers will liaise with the PSNI and if necessary the Coroner and Public Prosecution Service (PPS) to establish whether or not the PSNI is considering pursuing a case of manslaughter. It is however

recognised that a manslaughter charge is only likely to be considered where the death appears to have resulted from reckless disregard for health and safety.

***Appendix 3.
Additional
information
relating to
enforcement
of
Consumer
Protection.***

Council officers will liaise with the home authority of a business where it has sites across a number of Council areas, and consider the opinion of that authority in making any decision about enforcement action that may be a formal caution or prosecution.

**Appendix 4.
Additional
information
relating to
enforcement
of
Environmental
Protection
including
Noise**

Working with other Regulators

Where the council and another enforcement body both have the power to prosecute, the council will liaise with that other body to ensure effective co-ordination, to avoid inconsistencies, and to ensure that any proceedings instituted are for the most appropriate offence. Other regulators will include the Department of the Environment, the Northern Ireland Housing Executive.

**Appendix 5
Additional
information
in relation
to other
areas of
enforcement**

A determination shall be made of what, if any, enforcement action is appropriate, in accordance with the general principles and taking into consideration the operational arrangements of the Council in relation to specific type offences. The type of enforcement action that may be taken shall either be from the following informal and formal options noted below:

Informal Action - Informal action includes offering advice, verbal warnings and requests for action, the use of letters and the issue of inspection reports.

Informal action is appropriate in the following circumstances:

- The act or omission is not serious enough to warrant formal action;
- From the individual's/enterprise's past history, it can be reasonably expected that informal action will achieve compliance within a reasonable time;
- Confidence in the individual/enterprise's management involved is high;
- The consequences of non-compliance will not pose a significant risk to the community or individuals.

Formal Action -includes

- Verbal warning.
- Warning/enforcement letter.
- Relevant notice
- Seizure
- Fixed penalty
- Formal Caution
- Prosecution (including prosecution of individuals).

Formal Action may be taken in cases where informal action has failed to achieve the necessary outcome or where the breach is serious enough (taking into consideration operational guidance in relation to specific type offences) to warrant formal action in its own right.

The Council recognises that the initiation of a prosecution is a serious matter that should only be taken after full consideration of the implications and consequences. The Council will normally prosecute in any of the following circumstances (the list below is not exhaustive):-

- Where a fixed penalty has been issued, the period for which the notice may be paid has expired and the notice remains unpaid.

- Where the offence involves a failure to comply in full or in part with the requirement of a statutory notice; or there has been a repetition of a breach that was subject to a Formal Caution.
- Where there is a history of similar offences in relation to non-compliance with Notices.
- Excessive or persistent breaches of regulatory requirements.
- Obstruction of Council staff in carrying out their powers (*).
- The gravity of the alleged offence. Where the gravity of the alleged offence, taken together with the serious of any actual or potential harm, or the general record and or approach of the offender warrants it.

** Where an officer is assaulted, threatened or abused the Council will seek police assistance, with a view to seeking prosecution of offenders.*

Report to:	Sustainability and Environment Committee
Date of Meeting:	19th June 2024
Subject:	Update on the new safeguarding measures for XL Bully breed type dogs introduced by the Department of Agriculture Environment and Rural Affairs (DAERA)
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability & Environment
Contact Officer (Including Job Title):	Sinead Trainor, Assistant Director Environment

For decision	x	For noting only	
1.0		Purpose and Background	
1.1		To update members on the new safeguarding measures for XL Bully breed type dogs to be introduced by Department of Agriculture, Environment and Rural Affairs (DAERA).	
2.0		Key Issues	
2.1		<p>On 5 March 2024 DAERA Minister Andrew Muir announced his intention to introduce new safety measures for XL Bully breed type dogs in Northern Ireland as it believes it is the most appropriate way to protect public safety.</p> <p>In a statement to the Assembly, Minister Muir outlined his plans to introduce a scheme requiring owners of XL Bully breed type dogs to appropriately record and account for their dog with Local Councils, ensure they are neutered, muzzled and on a lead at all times in public places. Breeding will also be prohibited alongside selling, giving away or abandoning.</p> <p>The Dogs (Northern Ireland) Order 1983 (as amended) and the Dangerous Dogs (Northern Ireland Order) 1991 currently enables councils to impose control conditions on dogs where an officer has reasonable cause to believe that an offence has been committed. For example, one such condition would require that the dog be kept securely confined in a building, yard or other enclosure.</p> <p>The forthcoming legislation regarding XL Bully type dogs will require the animal to be muzzled and be on a lead, which is being held securely by a person no less than sixteen years of age, when in a public place.</p> <p>There are approximately 200 XL Bully breed type dogs licensed in Northern Ireland.</p> <p>The number of licensed XL Bully dogs in Northern Ireland has increased by over 100% in the last six months, following the announcement in September 2023 by the UK Government that these dogs would be subject to a ban in England and Wales. This followed a series of fatal attacks in Great Britain; many of which were attributed to XL Bully type dogs.</p>	
2.2		SOLACE nominated representatives from the EHNI (Northern Ireland Dog Advisory Group - NIDAG) who represent local councils' dog warden services, to engage with DAERA to discuss the pending legislation and the implementation of an exemption scheme. Liaison meetings have taken place on 27 March and 10 April 2024 where DAERA officials have responded to issues raised about the implementation of the exemption scheme.	

2.3	<p>DAERA intends to make legislation by June 2024 as it is deemed the most appropriate way to protect public safety. The legislative timeline is outlined in Appendix 1.</p> <p>Although the proposed legislation mirrors current legislation in the rest of the UK, the application process in Northern Ireland will differ significantly from that in the rest of the UK as it will be managed by local councils. DAERA is also currently reviewing sections relating to the transfer of ownership and the revocation of exemption certificates.</p> <p>These Proposed/New restrictions are to be effective from 28th June 2024.</p> <p>When the legislation comes into effect in Northern Ireland, it will be illegal to breed, sell, gift, exchange, abandon an XL Bully type dog, or permit it to stray.</p> <p>DAERA is liaising with a number of interested groups including The Dog Control Coalition and Veterinary Northern Ireland (Vet NI) on the new safeguarding measures for XL Bully breed type dogs.</p>
2.4	<p><u>Guidance</u></p> <p>DAERA will develop guidance and practical support to allow owners to understand the impending legislative changes, including how to identify an XL Bully breed type dog using the current Defra Conformation Standard developed by the UK Government.</p> <p>It remains the case that owners are responsible for controlling their dog, both at home and in public. DAERA have published advice and guidance on 'responsible dog ownership' and 'sharing your house with a dog' and it is intended that this information will also be included in upcoming messaging on XL Bully type dogs. Owners will be required to self-assess their dog using the XL Bully breed conformation standard and where the dog meets a substantial number of the characteristics outlined, it will be considered an XL Bully breed type.</p> <p>Guidance is also available for enforcement officers applying the XL Bully breed type conformation standard.</p>
2.5	<p><u>Self-Certification/Exemption Scheme</u></p> <p>Owners of XL Bully type dogs will be required to self-assess their dog using the conformation standard developed by Defra. An application may be made to Local Councils for an Exemption Certificate within a specific timeframe. After this period, it will be illegal to own an XL Bully type dog in Northern Ireland.</p> <p>The new scheme will require owners to:</p> <ul style="list-style-type: none"> • Appropriately record and account for their dog, with the Local Council. • Pay an application fee of £92.40 to obtain an Exemption Certificate • Have appropriate insurance in place • Always keep their dog on a lead in a public place and ensure that the dog is muzzled. • Their XL Bully breed type dog must also be neutered and breeding from these dogs will be prohibited. <p>It will also no longer be permissible to:</p> <ul style="list-style-type: none"> • sell an XL Bully dog • abandon an XL Bully dog or • give away an XL Bully dog

	Details of the exemption scheme are yet to be finalised; however, it is anticipated that the application window for exemption certificates will be open from mid-summer until the end of December 2024, providing almost five months for applications to be submitted.
2.6	<p><u>Compensation Scheme</u></p> <p>DEARA also propose to introduce 'The Dangerous Dogs (Compensation and Exemption Schemes) (Northern Ireland) Order 2024 which a compensation scheme will be available should the owner of an XL Bully breed type dog not wish to adhere to these measures and no longer wishes to keep their dog. Dog owners may voluntarily surrender their XL Bully type dogs for euthanasia, and receive financial compensation of £100, plus £100 towards Vets costs.</p> <p>Valid compensation claims will be processed fully by DAERA and the closing date for all claims is to be confirmed.</p>
2.7	<p><u>Communications/Awareness campaign</u></p> <p>DAERA, in conjunction with local councils, will ensure that communications are issued in advance of the restrictions coming into effect, including details of the steps required to comply and enable the XL Bully dog owners to prepare for the changes.</p>
3.0	Recommendations
	Members are asked to note the contents of the report and support the introduction of new safeguarding measures for XL Bully breed type dogs in Northern Ireland.
4.0	Resource implications
4.1	<p>The implementation of the pending legislative controls for XL Bully breed type dogs is at an annual net cost to Councils going forward. Councils are liaising with DEARA through SOLACE NI and the Northern Ireland Dog Advisory Group (NIDAG) regarding the most cost-effective way of delivering this service and the future funding requirements for Councils to undertake these additional responsibilities.</p> <p>DAERA is liaising with the Department of Finance (DoF) on these financial impacts which include - Administration of self-certification exemption process; Upgrade/development of existing IT systems; Bespoke training of dog control (and animal welfare staff) across councils; Kennelling costs; and legal expenses associated with Enforcement activities.</p>
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><i>n/a</i> <input 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>

	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> n/a	
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	
	Appendix 1 – Legislative Timeline	
8.0	Background Documents Announcement by DAERA Minister on plans to ban American Bully XL type dogs - 5 March. Defra Guidance: Applying the XL Bully breed type conformation standard	

Appendix 1: Legislative Timeline

Provisional Dates	Change
7 June 2024	<p>Make and lay first stage of legislation 'The Dangerous Dogs (Designated Type) Order (Northern Ireland) 2024'</p> <p>Adds XL Bully Dogs to the dangerous dogs list and sets a date for which becomes illegal to own an XL Bully dog without an Exemption Certificate.</p>
28 June 2024	<p>XL bullies must be on a lead and muzzled in a public place.</p> <p>Dogs cannot be bred, gifted, sold, exchanged, abandoned or to allowed to stray.</p> <p>It is still legal to own an XL Bully dog.</p>
Before Assembly summer recess	Make and lay second stage of legislation. 'The Dangerous Dogs (Compensation and Exemption Schemes) Order (Northern Ireland) 2024'.
1 August 2024	Applications for exemption certificates open.
31 December 2024	After this date it is illegal to own an XL Bully dog without an exemption certificate.

Report to:	Sustainability and Environment Committee
Date of Meeting:	19th June 2024
Subject:	DAERA Consultation – Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability & Environment
Contact Officer (Including Job Title):	Sinead Trainor, Assistant Director Environment

For decision	x	For noting only	
1.0		Purpose and Background	
1.1		The purpose of this report is to seek Member approval of the response to the consultation entitled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' published by Department of Agriculture, Environment & Rural Affairs (DAERA).	
2.0		Key Issues	
2.1		<p>Consultation opened on 7th March and closes on 27th June 2024. Members were presented with an overview of the consultation at the Cleansing and Refuse Task group meeting of 22 May 2024.</p> <p>The consultation invites views on proposals aimed at improving the quality of household and non-household municipal recycling, how to improve reductions in food waste, how to cut landfill rates and how to get businesses on board to increase recycling rates.</p> <p>The aim of the consultation is to bring forward new policy options for the DAERA Minister to consider. Proposals and questions focus on issues such as how new measures might best be implemented, considering views on practicality, economic barriers and how the future of recycling in Northern Ireland might look.</p> <p>The consultation has been collaboratively designed, building on several policy options based on responses to the 2020 'Future Recycling & Separate Collection of Waste of a Household Nature in NI' discussion document. The proposals in the consultation are designed to maximise the benefits of recycling to the environment and to the local economy. This includes looking at options for making improvements to the ways material is collected from households and increasing recycling from businesses and producers of non-household municipal (NHM) waste.</p>	
2.2		<p>The EU Circular Economy Package (CEP), which the UK committed to prior to EU exit, was transposed into domestic legislation in December 2020 via the Waste (Circular Economy) (Amendment) Regulations (Northern Ireland) 2020.</p> <p>This amended the content of the Waste and Contaminated Land (Northern Ireland) Order 1997 and introduced a range of targets including a municipal waste recycling target of 65% by 2035 (with interim targets of 55% by 2025 and 60% by 2030) and municipal waste landfill target of 10% or less by 2035.</p>	

	<p>The legislation also extended the definition of 'municipal waste' to include waste collected from other sources other than households where the waste is similar in nature and composition.</p> <p>This means that most businesses, public sector and third sector organisations are now in scope of this revised definition. In addition to these targets, there is also a new recycling target arising from the Climate Change Act (NI) 2022, which requires Northern Ireland to achieve a 70% waste recycling rate by 2030.</p>
3.0	Recommendations
	<p>Members are asked to:</p> <ul style="list-style-type: none"> Approve the consultation response entitled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' published by Department of Agriculture, Environment & Rural Affairs (DAERA).
4.0	Resource implications
	No additional resources associated with this report.
5.0	Due regard to equality of opportunity and regard to good relations (complete the relevant sections)
5.1	<p>General proposal with no clearly defined impact upon, or connection to, specific equality and good relations outcomes</p> <p>n/a <input checked="" type="checkbox"/></p>
5.2	<p>Proposal relates to the introduction of a strategy, policy initiative or practice and / or sensitive or contentious decision</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>Rationale: n/a</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>

	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 Appendix 1 – Consultation response entitled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' published by Department of Agriculture, Environment & Rural Affairs (DAERA).
8.0	Background Documents Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI Consultation Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)

Proposal 1

To restrict the residual waste capacity for households in Northern Ireland to a maximum of 90 litres per week, delivered either via a 180-litre wheeled bin collected fortnightly or a 240 litre wheeled bin collected every three weeks. Councils would decide on the most appropriate methodology for their own circumstances.

Newry, Mourne and Down (NM&D) District Council agree that a restricted residual waste capacity is required to achieve higher household recycling rates of 65-70% and note that NM&D District Council has achieved an average household dry recycling rate of circa 24.2% and an average household waste preparing for reuse, dry recycling, and composting rate of circa 51.2% over the past 4 years whilst operating the commingled recycle collection (including glass). We also note that Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils. This approach should also extend to all other waste collection services.

We note the recent updates (November 2023) to the Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England which states *"Through statutory guidance, we propose requiring local authorities to collect residual (non-recyclable) waste at least fortnightly, if not more frequently, to protect local amenity and prevent unintended consequences of cutting residual waste collection frequency"*. It is believed that the responsibility for reducing residual waste capacity should rest with individual Local Authorities, as they are best equipped to determine the most effective solutions for their specific regions. We also note the last sentence of Proposal 1 stating *"Councils would decide on the most appropriate methodology for their own circumstances"*. NM&D District Council agree with this statement and believe this approach should be applied across all proposals within this Consultation.

The Government response to outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' also confirms that they *"propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect"*. This 'co-collection' featuring a minimum of three bins per household (dry recyclables, organic, residual) provides a straightforward method for residents, eliminating the confusion of sorting. Additionally, having only three bins reduces the number of containers residents need to manage, decreasing storage clutter. This efficient system saves space and simplifies waste management for residents, fostering a more orderly routine. We propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.

The policy updates to the DEFRA Simpler Recycling Guidance notes that they will be *"providing resource funding to be spent from 2024/25 to support local authorities to transition to the implementation of weekly food waste collections where they need to expand or introduce weekly food waste collections from households. Local authorities will receive ongoing resource funding*

from 1 April 2026." Further information on this policy update can be accessed via the following link: defracollectionandpackagingreform.cmail19.com/t/t-e-edltdn-jkjdjlruh-z/

A collective move for the roll out of restricted capacity residual waste collections would allow for clear messaging to all householders on the need to reduce residual waste and maximise kerbside recycling for dry recycling and food & garden waste. However, achieving this simultaneously across Northern Ireland within 24 months may present challenges due to the large quantity of bins required for procurement, manufacture, and delivery.

Proposal 2

To require local Councils to collect a core set of dry recyclables from households to help avoid confusion and improve consistency and the quality of recyclable material.

Newry, Mourne and Down District Council agree that to help avoid confusion amongst residents, establishing a core set of dry recyclables from householders would be beneficial. However, we would question the statement that this approach will improve consistency and the quality of recyclable materials given that most NI Councils are already collecting the majority of such materials at the kerbside.

Proposal 3

That additional materials are added to the core set over time when feasible, with flexible plastic packaging set to be collected from households by the end of the financial year 2026/2027.

Newry, Mourne and Down District Council note that the implementation of any changes to the core set of materials following a review period must consider contractual arrangements. We question whether there has been sufficient consultation with the reprocessing sector to assess the availability of suitable infrastructure and appropriate capacity for handling additional materials by the year 2026/27. It is essential to review the list of materials with input from the waste treatment and reprocessing sector. Effective communication and collaborative planning with local authorities and the waste treatment sector will enhance understanding, ensuring that any new materials collected are both efficiently handled and have a proven market value. Moreover, ensuring the accessibility of reprocessing infrastructure is crucial to support the implementation and sustainability of these recycling initiatives.

The Rethinking Our Resources Consultation confirms that the "range of materials would only be added to the core set when supported by evidence that materials can reasonably be collected for recycling and can reasonably be recycled. By this, we mean that there is capacity locally in NI, GB, and Ireland or if necessary, further afield into Europe, that it can technically be recycled and that the cost of reprocessing is not prohibitive". NM&D District Council supports this statement and believe this approach should also be applied for the processing of existing dry recyclable material collected at the kerbside.

To ensure stability, Councils are likely to seek longer term MRF sorting/processing contracts, and thus the proposed 2-year period for reviews would not be achievable. The implementation of new collection containers and the associated education of householders on such change in containers would take more than 2 year to accomplish.

Proposal 4

To highlight NI's unique legislation on the quality of dry recyclable materials, the proposed term QualiTEE should be adopted to describe the exceptions to collecting dry recyclable materials separately.

Newry, Mourne and Down District Council are concerned with this proposal as the new concept of QualiTEE had not been raised within prior discussion documents or Council workshops. This concept of 'QualiTEE' appears to place primary focus on the quality of recyclable materials over quantity with little agreed definition on what is meant by quality. We also note the unique Northern Ireland legislation on separate collections (page 22) which does not include card/cardboard to be collected separately from other recyclable materials. The absence of this waste stream from the list of key recyclable materials raises confusion as to the criteria in place for defining these categories and therefore we question the exclusion of card/cardboard as a key recyclable material.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is *'sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials'*. NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation. It is also noted that *"The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect"*. We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.

Proposal 5

The default position for collection of dry recyclables from households is in four separate streams.

It is very concerning that the 'default position' proposed i.e. four separate streams, surpasses the options discussed in earlier Recycling Discussion Documents and Council workshops. Previously, the 'separate' proposals focused on separating glass and/or paper from other materials which still would have caused difficulties, however not to the extent of this newly proposed 'four separate stream' collection system. Waste collection and management represents the largest expenditure for Councils annually. In light of the current economic climate, any additional costs beyond the existing collection/management expenses

are unsustainable without full funding to cover these extra expenses. Implementing this more intricate system without guaranteed financial support would place an untenable burden on Local Authorities, jeopardising their ability to manage waste effectively. Therefore, securing 100% funding for the additional costs is imperative for the successful adoption of any new system.

It is important to note that DAERA's own evidence (i.e., LACMW Reports) shows that Councils who operate the fully commingled system including glass are the top performing Councils in relation to household waste recycling. We also note that the commingled option aligns with the DEFRA Simpler Recycling Guidance, which advocates for a 'common-sense approach that is both easy and effective for everyone'. Collection systems that simplify the recycling process can enhance public participation and efficiency. We believe that the complex 'four separate waste stream' collection method would likely face public resistance and that a mandatory implementation of this collection method could potentially lead to lower recycling rates.

We also note the Government Response (published May 2024) to the Consultation Outcome on exemptions and statutory guidance for Simpler Recycling in England which states that "allowing local authorities and other waste collectors to make these decisions locally will ensure a commonsense approach to delivering recycling services and avoid a proliferation of unnecessary bins." Councils are uniquely positioned to know what will work best for their residents and therefore DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should left to individual Councils.

Table 1.1 below offers a comparison in average public set out rates between Councils operating the commingled system (including glass) and Councils operating the kerbside sort system. These figures have been sources from the 2017 DAERA Waste Composition Analysis Study and WRAP reports on trial performance.

Table 1.1 Average Public Set Out Rate

Council	Scheme Type	Average Set Out %
Lisburn & Castlereagh	3 Stack Kerbside Sort Scheme	59.8
Antrim & Newtownabbey	3 Stack Kerbside Sort Scheme	65.15
Mid Ulster	Commingled Bin Scheme including glass	87.3
Fermanagh & Omagh	Commingled Bin Scheme including glass	88.43
Newry Mourn & Down	Commingled Bin Scheme including glass	85

As evidently shown in Table 1.1, public set out rates in the commingled bin system are much higher when compared to the kerbside sort system. We believe this is largely due to the simplicity and convenience offered by the commingled including

glass system. Offering a simplified sorting process for users will encourage greater participation, which ultimately achieves higher recycling rates.

Table 1.2 below outlines the 2022/23 NIEA Local Authority Collected Municipal Waste (LACMW) household waste dry recycling rates achieved by each individual NI Council. It is evident that those Local Authorities operating the commingled including glass system have achieved the highest household waste dry recycling rate. Subsequently, those Local Authorities fully or partially operating the kerbside sort system achieved the lowest household waste dry recycling rate. It is our opinion that public participation plays a vital role in achieving higher rates of dry recycling. Therefore by offering a simplified, user-friendly system such as the commingled scheme combined with efficient communication to residents, a higher participation rate can be expected and thus a higher dry recycling rate is the result.

Table 1.2 NIEA LACMW Household (HH) Waste Dry Recycling Rates

Council	HH waste dry recycling rate	Scheme Type	Rank
Derry City & Strabane	27.9	Commingled including glass	1
Fermanagh & Omagh	26.6	Commingled including glass	2
Causeway Coast & Glens	25.7	Commingled including glass	3
Mid Ulster	24.2	Commingled including glass	4
Armagh City, Banbridge & Craigavon	24.2	Commingled including glass	5
Antrim & Newtownabbey	24.2	Kerbside sort/commingled no glass	6
Newry, Mourne & Down	23.1	Commingled including glass	7
Belfast	21.9	Outer city area on commingled no glass, inner city on kerbside sort	8
Ards & North Down	20.8	Commingled with separate glass collection	9
Lisburn & Castlereagh	18.9	Circa 1/3 of HH on kerbside sort with remainder on commingled no glass	10
Mid & East Antrim	18.9	Large proportion with Kerbside sort	11

The commingled bin system offers the highest level of adaptability for changes in the types and volumes of recyclable materials, making it a sustainable collection method. According to the 2017 Compositional Analysis Study, paper and cardboard make up 50.7% of dry recyclables. This percentage is expected to rise due to the growing trend of online shopping and upcoming modifications from the Extended Producer Responsibility (EPR) policies. As a result, the small capacity box

used in the 3-stack kerbside sort system will face increased strain. The 3-stack box system provides a total capacity of 150 litres. However, with paper and cardboard representing approximately 50.7% of the dry recycling-more than half- this waste stream is only allotted circa 26% of the available capacity in the 3-stack kerbside sort system. Consequently, this system fails to offer a sustainable or future-proof method for waste collection.

In order to understand and evaluate the capital and operational costs associated with a change to the Kerbside Sort System an economic model was completed. The results from this economic assessment are presented in Table 1.3 below.

The following considerations were accounted for within this economic model:

- Assessment of vehicles required and replacement cycles.
- Container purchase, assembly, delivery, replacements.
- Collection and disposal of existing commingled containers.
- Container storage prior to roll out.
- Staffing costs.
- Communications.
- Known market rates and gate fees.
- Vehicle maintenance/running costs (i.e., fuel, vehicle tax, PSV wash and test fees, vehicle insurance, tyre cost, and vehicle repairs).

Table 1.3 Financial Model for Change to Kerbside Sort

7 Year Capital Cost (£)	
Stillage Vehicles	8,280,000
Replacement Cycle for RCVs	2,200,000
Storage Facility Rental	315,000
Communications Campaign	135,891
Triple Stack Box + Assembly & Delivery	3,292,176
180 L Bin + Assembly & Delivery	1,508,914
Collection & Disposal of Bins	205,761
Total Capex	15,937,742
7 Year Operational Cost (£)	
Container Replacements	197,568
Staff	36,918,000
Vehicle Running Costs	6,080,470
Gates Fees	33,703,918
Potential Revenue Share on Recyclates	3,106,149
Total Opex	73,793,806
7 Year Grand Total Cost (£)	
Grand Total	89,731,548

It should be noted that the costs shown in Table 1.3 represent raw figures excluding inflation and therefore would be over and above upon the inclusion of inflation rates. The costs to implement and operate the kerbside sort system are considered to be cost prohibitive for Newry Mourne & Down District Council. We are not convinced of the need to invest in a change to the kerbside sort system that has shown to be less efficient than the currently operated commingled bin system. It is considered a more reasonable solution to enhance the current commingled system which could potentially involve increasing the capacity for recycling and reducing the capacity for residual waste collections.

NM&D are deeply committed to ensuring the health and safety and wellbeing of all NM&D staff across all operations. Therefore, we are greatly concerned for the potential implementation of a waste collection system that threatens the well-being of our associated employees due to the increased risk for musculoskeletal disorders.

A 'Body Mapping' report by the Glasgow Caledonian and Greenwich Universities provides the findings of a case study undertaken to identify levels of MSD (Musculoskeletal Disorder) in relation to the methods of waste collection. As part of this case report, 3 surveys were conducted using the same Local Authority service. The first survey was conducted in 2010 when the following collection system was operated:

- Weekly collection of refuse (140 litre wheeled bin);
- Fortnightly collection of paper, cans, and plastic (two 33 litre baskets);
- Monthly collection of glass (50 litre boxes).

The second (2013) and third (2014) surveys were conducted after the implementation of a new system which included the following;

- Fortnightly collection of refuse (140 litre wheeled bins);
- Fortnightly collection of glass, paper, cans, and plastic (240 litre wheeled bins);
- Weekly food waste collection (20 litre mini bins);
- A paid for fortnightly garden waste service using (240 litre wheeled bins).

The key findings of this case report include:

- The parts of the body recorded as having the highest Average Pain Count (APC) (i.e., shoulder and neck/upper spinal) had reduced from 0.91 to 0.19 due to reduced manual handling as a result of removing the boxes and baskets.
- Lower back pain reduced from 0.86 to 0.64 as a result of removing the requirement of boxes and baskets.
- Loaders who handled and sorted materials in 2010 contained in boxes and baskets (arm including elbow, shoulder/neck,) with the activity involving bending lifting and twisting had an APC of 2.08. These operatives also had an APC for lower back pain of 0.76 related to bending down to pick up and throw (side) bagged waste. The next highest APC were loaders who handled and sorted materials contained in boxes and baskets (arms including elbow, shoulder/neck, and lower back).
- Activities with the lowest APC were those involving wheeled bin collections (excluding food waste and garden waste collections).

Ensuring the health and safety of our staff members is paramount in all operations conducted by NM&D District Council. Therefore, introducing a waste collection system involving repetitive bending, turning, and lifting of boxes poses a significant threat to the well-being of our employees due to the potential for musculoskeletal disorders. The kerbside sort system also involves the loading of waste into the stillage vehicle from both sides which would place the collection crew in a live lane of traffic on a regular basis. We therefore cannot agree with compromising their safety for the sake of operational changes to a system that has shown to achieve the lowest participation rates (evident in Table 1.1), dry recycling rates (evident in Table 1.2) and has proven to increase health and safety risk. NM&D District Council therefore believe it would be most appropriate to focus on enhancing the current commingled collection system to further improve its performance whilst also ensuring the health and safety of staff is prioritised in any operational change.

Proposal 6

Standardised written assessments are prepared by councils where two or more dry recyclables are mixed during the collection process, evidencing why separate collections are not practicable and that co-collection delivers recyclable material of comparable quality.

NM&D District Council disagrees with this approach. We are not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. The above proposal is a significant diversion from DEFRA's Simpler Recycling Guidance. We believe that an imposed separate collection of recyclables or further administrative burden to justify the use of the current best performing system (commingling) would add significant cost burden on Council finances and would therefore divert resources that could otherwise be directed towards improving recycling infrastructure, public education, and other measures to further enhance the achievements already obtained through the implementation of the commingled system. The only way that Councils could recover these costs would be through increasing District Rates at a time when household finances are already stretched with the current cost of living. The addition of such requirements as referenced within this proposal goes against the primary goal of creating a simple and user-friendly recycling system that encourages maximum participation and significantly enhances recycling rates.

Table 1.4 outlines the 2022/23 DAERA LAC Municipal Waste Report figures on Council dry recycling capture rates and demonstrates the efficiency of the commingled system in achieving the highest dry recycling capture rates. The figures included within Table 1.4 exclude recyclates collected at recycling centres, therefore focusing solely on the performance of each Councils' kerbside collection system. Newry Mourne & Down District Council have achieved the third highest dry recycling capture rate from kerbside collections. It is evident that Councils operating the commingled including glass system have achieved higher dry recycling capture rates when compared to those Councils either fully or partially operating the kerbside sort system. This demonstrates how the commingled (including glass) collection system presents the highest potential for meeting established recycling targets.

Table 1.4 Dry Recycling Capture Rate (T/HH/Annum)

Council	Dry Recycling Capture Rate (t/HH/Annum)	Scheme Type	Rank
Mid Ulster	0.195*	Comingled including glass	1
Fermanagh & Omagh	0.180*	Comingled including glass	2
Newry Mourne & Down	0.171*	Comingled including glass	3
Derry & Strabane	0.161*	Comingled including glass	4
Ards & North Down	0.158*	Comingled separate glass	5
Causeway Coast & Glens	0.157*	Comingled including glass	6
ABC	0.148*	Comingled including glass	7
Antrim and Newtownabbey	0.125	Kerbside sort/commingled no glass	8
Mid & East Antrim	0.116	Large proportion with kerbside sort	9
Lisburn & Castlereagh	0.107	Circa 1/3 HH on kerbside sort with remainder on commingled no glass	10
Belfast	0.089	Outer city area on commingled no glass, inner city on kerbside sort	11

*Figure after contamination has been removed

Within the Rethinking Our Resources Consultation it is noted that "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of the onerous QualiTEE assessment.

We also note that Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils. This approach should also extend to all other waste collection services.

Proposal 7/7a

A set of conditions should be set out that define comparable quality, best environmental outcome, technical feasibility, and disproportionate economic cost- "QualiTEE". Where conditions are met, an exception may apply, and two or more recyclable waste streams may be collected together from households.

Similar guidance on MRF sampling, to that used in England and Wales, should be introduced in NI to ensure that the quality of input and outputs for MRFs can be quantified.

The wellbeing and safety of our staff must be prioritised when implementing a collection system that is both user-friendly for maximising public participation and efficient in meeting set recycling targets. We are concerned at the limited reference to health and safety within the proposed assessment. The four waste stream approach which can only be executed via a kerbside sort system, would increase the risk to health and safety for collection crew and road users (as detailed in the response to Proposal 5) The current commingled system has proven to maximise the safety of our collection staff whilst also providing a user-friendly and efficient system. We also refer to Section 18 of the Waste Regulations (NI) 2011 which notes that the separate collection of waste is not "technically feasible in taking into consideration good practices in waste collection". It is therefore difficult to justify the substantial expenditure associated with switching to a less efficient system that is regarded as 'not technically feasible' in regard to health and safety practices. Ensuring the well-being of our workforce is our primary concern, and we consider employee health and safety to be a higher priority than any perceived increase in material quality achieved through separate collection of recyclables.

We are greatly concerned about DAERA's position that people or historical preferences do not fall within the scope of technical feasibility, given that public participation is crucial to the success of recycling schemes. Councils have a statutory approach to take into account the views of their residents in the delivery of services and to carry out related Equality Impact Assessments and Rural Needs Analysis to ensure fair and inclusive practices. It is our opinion that if a separate collection of recyclables was enforced, public participation in recycling would decrease, and reduced recycling rates would be the result.

NM&D District Council is concerned that the new concept of 'QualiTEE' was not raised during in previous Discussion Documents or Council workshops. The terminology used also appears to primarily focus on the quality of recycle material as opposed to the quantity of recycle material and shows less emphasis on the other economic, technical, and environmental concerns. It is important that clear metrics are established for assessing the quality of recycles as this will allow Councils to ensure clear quality standards which can then be integrated within contracts. DAERA need to engage with Local Authorities and waste processors to clearly define the benchmark of +/-2% for closed loop recycling and +/-5% for open loop recycling.

Proposal 8

The quality of recycle for reprocessing is important and needs to be improved through changes to collections and clear measures should be set to describe quality.

Tables 1.2 & 1.4 as part of the response to Proposals 5 & 6 both demonstrate the performance of the fully commingled system. NM&D District Council recognise the importance of high-quality recyclate, however, to meet higher recycling targets, the quantity of recyclables collected must also be prioritised. We believe that a fully commingled system will match the quality of other systems but will also yield a higher quantity of recyclable material. It should be considered that if local reprocessors were to invest in upgrading their facilities (i.e. Robotics/AI), they could then better accommodate materials from commingled systems. This will in turn reduce the need for capital investment in new vehicles and containers. We again highlight that the kerbside sort system due to its available capacity and allocation of capacity to the differing waste streams fails to offer a sustainable or future-proof method for waste collection.

Proposal 9

Commingled collection of plastics and metals should be exempt from requirements to collect these materials as separate fractions.

NM&D District Council agree with the proposed exemption allowing for the collection of plastic and metal together. However, we seek clarification on how these exemptions align with Northern Ireland's legislation and why similar exemptions cannot be granted for other materials. We are not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. We believe that the allowance for plastic and metals to be collected together should be extended to permit all of the core materials to be collected together in a comingled kerbside collection, which is consistent with DEFRA's Simpler Recycling Guidance and the systems in place in England.

Proposal 10

Revisions to household food waste collections to increase capture rates and improve the diversion of food waste from disposal should be introduced, ensuring all householders, including those living in flats, can recycle more and in time have access to separate, weekly food waste recycling collections.

Table 1.5 below details the volumes of food waste generated from both a separate food waste collection and a comingled food and garden waste collection. These results are derived from Volume 2 of the 2017 NI Waste Compositions Analysis Report.

Table 1.5 Food Waste Collection

Council	Kg/HH/Week Food Waste in Comingled Collection	Kg/HH/Week in Separate Food Waste Collection
Antrim & Newtownabbey	0.7 - 2.6	0.8
Ards & North Down	1.0 - 1.5	
ABC	0.6 - 1.2	1.3 - 1.9
Belfast	1.8 - 1.8	0.4 - 1.4

Causeway Coast & Glens	0.7 – 0.7	1.8 – 2.0
Derry & Strabane		0.7 – 1.5
Fermanagh & Omagh		0.4 – 1.3
Lisburn & Castlereagh	0.9 – 1.5	
Mid & East Antrim	1.5 – 2.2	
Mid Ulster	0.9 – 0.9	
Newry Mourne & Down	0.5 – 0.7	
Average	0.95 – 1.45	0.9 – 1.62

As indicated in the Table 1.5 above, a commingled food and garden waste collection obtains a similar quantity of food waste per household when compared to a separate food waste collection. It is our opinion that a restricted residual waste capacity combined with increased communication with residents to use the brown bin in the residual bin, would effectively remove food waste from the residual waste bin.

Considering the 240l capacity of the commingled food and garden waste bin, compared to the 23l caddy bin collected weekly, we believe that implementing a Northern-Ireland wide restriction on the capacity of the residual bin would be the most effective strategy for diverting food waste from the residual waste bin. This approach is believed to have a greater impact in food waste diversion compared to implementing a weekly collection of food waste. Additionally, we believe that a separate weekly food waste collection would adversely affect the feasibility of garden waste collections during the winter months.

UK research indicates that fortnightly collections of mixed food and garden waste can result in "lower yields compared to a weekly food waste collection". However, we believe that data specific to Northern Ireland is essential to verify this claim. Therefore, we request the results of the recent composition studies conducted in other Council Districts to provide a clarity on this.

It should also be noted that WRAP have acknowledged that the commingled biowaste schemes in Northern Ireland are among the most effective/best performing in the UK. The 2017 NI Waste Compositional Study confirmed that during the first phase (Summer), more food waste (1.07kg/hh/week) was collected from the commingled schemes in comparison to separate collections (0.92kg/hh/week). When an average of the first (summer) and second (winter) phases are taken the difference is marginal with an average of 1.2 kg/hh/week from commingled schemes compared to 1.28 kg/hh/week from separate food waste collections. We therefore question how it can be justified the substantial costs associated with switching to separate weekly food waste collections. It should also be considered, the potential impact on recycling rates across Northern Ireland should a separate weekly food collection be imposed as the continued separate collection of garden waste would no longer be feasible.

Proposal 11

Through collaboration with Councils, we will set out proportionate and robust guidelines for compliance and enforcement that enable Councils to enhance their waste and recycling services.

NM&D District Council believes that education and awareness initiatives should come before enforcement measures. Imposing fines might negatively impact recycling participation and the quality and quantity of materials collected. By focusing on educating residents, a better understanding and commitment to proper recycling practices can be promoted. Additionally, addressing existing regulations about waste acceptance at Recycling Centres is crucial for resolving enforcement issues related to commercial waste.

Proposal 12

Non-Statutory Guidance will be provided to councils to expand the opportunities to recycle more materials and to embed best practice in existing services.

NM&D District Council are in support of the provision of non-statutory guidance to Councils and believe that all decisions regarding the proposals in the consultation should be based on such guidance as Local Councils are best placed to make informed decisions of their waste collection systems and policies, based on their detailed understanding of the conditions/needs of their community.

Annex A – Questions posed via Citizen Space for consultation.

GENERAL

1. What is your name?

Sinead Murphy

2. What is your email address?

sinead.murphy@nmandd.org

3. Are you responding to this consultation representing an organisation you work or volunteer for?

☒ Yes. Skip to Question 5.

☐ No

4. You selected "no" to Question 3. This means that you are responding to the consultation as an individual householder/member of public. If this statement does not describe how you wish to respond, please amend your answer to Question 3. If you are happy to proceed, please select Yes. If you select No, the survey process will end.

☐ Yes. I am responding as a householder/member of public. Please proceed to Proposal 1.

☐ No

5. Which category best represents you from the list below?

Category	Please Select
Trade Body (Waste Sector)	
Local Council	x
Local Council Sector Body	
Waste Management Company (Collectors, Sorters, Infrastructure Operators of Treatment Facilities for various streams)	
Reprocessors (End Destination)	
Non-Governmental Organisation (NGO)	
Businesses and Non-Household Municipal (NHM) producing organisations	
Trade Body (representing business sectors)	

Other	
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If applicable, please state the name of the organisation you are responding on behalf of.

Newry Mourne & Down District Council

Part 1: Proposals to improve commonality in recycling from households

Proposal 1: To restrict the residual waste capacity for households in Northern Ireland to a maximum of 90 litres per week, delivered either via a 180-litre wheeled bin collected fortnightly or a 240 litre wheeled bin collected every three weeks. Councils would decide on the most appropriate methodology for their own circumstances.

1. Do you agree with the proposal to restrict the capacity of residual waste for average households to a maximum of 90 litres per week? Some households may require additional containment or alternative arrangements. See question 6.

☒ Yes -agree.

☐ No - If no, your response should include clear evidence as why residual waste capacity should not be restricted. Evidence with justification to extend timescales should be provided, if appropriate.

☐ Unsure

<p>NM&D District Council agrees that a restriction on residual waste is required to achieve higher household recycling rates. We believe that the decision on the most appropriate collection method for achieving such targets should be left to individual Councils i.e., through bin size and/or frequency of collection. We request the department to confirm on the requirement for achieving higher municipal waste recycling targets, whether it is to be achieved collectively by Councils and businesses, or achieved on an individual Council basis. Please see further information provided in Annex 1.</p>
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2. Some Councils may not be able to restrict the capacity of residual waste by the date proposed (within 24 months of notification of a statutory requirement). In this table we set out some circumstances which may delay changes to residual waste restriction. Please complete the table, providing evidence with justification as to why timescales should be extended, as appropriate.

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Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for residual waste treatment	N/A
Procurement processes for new containers	x
Manufacturing capacity for new containers	x
Projects outcomes from residual waste reduction action	N/A
Cost burdens	x
Ability to resource & mobilise within the required timescale	x
Other – please describe	<p>The roll out of new bins requiring bin delivery and removal on a large scale as there is a limited market for this type of support, therefore if all Councils were to commence a collective roll out, the 24-month proposed period may not be achievable.</p> <p>Section 5 (page 23) of the Consultation notes grant support of up to 50% of eligible capital costs available which would be insufficient to deliver such transformational change. This allocation is also significantly short of financial support packages offered</p>

- | | |
|--|--------------------------------------|
| | by other regional
UK governments. |
|--|--------------------------------------|
3. If the proposal to restrict the capacity of residual waste for households is adopted, what is your preference for how this should be delivered? If other, please provide an explanation in the box below.
- ☐ 180 litre capacity bins collected fortnightly.
- ☐ 240 litre capacity bins collected three weekly.
- ☒ Other
- ☐ Unsure

If you responded other, please set out your reasons, with clear evidence in the box below.

It is our opinion that the preferred approach for restricting residual capacity would need to be revisited once clarification is provided on the complete approach to kerbside collections (recommended and/or legislated) by DAERA.

It should be noted that if mandated regarding the provision of a twin or multi stream collection of dry recycling and/or a weekly collection of food waste, then this would come at significant additional revenue cost. This may result in the requirement for considering less frequent residual collections as a means of offsetting these costs. Whilst we agree that a restricted residual waste capacity is required to achieve higher household recycling rates, we must raise concern that with a reduced frequency of collection, public acceptance of such change may become a serious issue. As public participation plays a vital role in achieving higher rates of dry recycling, we must strive to provide a simplified, user-friendly system that will achieve maximum participation.

We also note that Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only legislate/stipulate what should be achieved in terms of targets. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils. This approach should also extend to all other waste collection services. We also note the last sentence of Proposal 1 stating "*Councils would decide on the most appropriate methodology for their own circumstances*". NM&D District Council agree with this statement and believe this approach should be applied across all proposals within this Consultation.

4. Do you agree that forms of restricted capacity for residual waste collections should apply to all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin?

- ☐ Yes
☒ No
☐ Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to collection of residual waste from communal settings, such as residual waste yields per dwelling per year and learnings or project outcomes from action to reduce residual waste in communal settings.

Whilst we are in agreement with the principal of restricting residual waste capacity for communal properties, we must also note the potential reality in achieving this as recycling containers can often be utilised as an overflow bin if residual capacity is deemed insufficient.

We believe it would be most beneficial for a guideline capacity for such communal properties, offering flexibility for Councils to take into account differing circumstances. Councils are best placed to utilise such guidelines combined with their knowledge and understanding of local circumstances to make an informed decision on what residual capacity is most suitable for communal type properties.

5. Do you agree that restricted capacity for residual waste collections should be rolled out across NI simultaneously (or as near as possible) to assist local councils with communicating the changes to households?

- ☒ Yes
☐ No
☐ Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence as to why a staggered roll out is preferable.

A collective move for the roll out of restricted capacity residual waste collections would allow for clear messaging to all householders on the need to reduce residual waste and maximise kerbside recycling for dry recycling and food & garden waste. However, achieving this simultaneously across Northern Ireland within 24 months may present challenges due to the large quantity of bins required for procurement, manufacture, and delivery. Taking into consideration the scale of planning and investment that would be required for such a collective move, a phased implementation within individual Councils may be required.

6. Do you agree that households who demonstrate that they meet the following criteria could be provided with more than the maximum of 90 litres per household per week?

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	Yes agree	No disagree	Unsure
Household comprises more than 6 residents	X	If selected, please define the number of citizens in a household where exclusions should apply, with evidence to justify your response.	
Households where citizens have medical conditions which produce additional waste, such as produce to manage incontinence	X	If selected, please provide evidence to justify your response.	
Households where there are more than two children using disposable nappies		If households with i.e., one adult having a medical condition which produces additional waste (e.g., produce to manage incontinence) would qualify for additional capacity, there cannot be a restriction on the number of children in nappies. Any household with children in nappies should be eligible for additional capacity, and this should be	x

		kept under review.		
All households in the collection subsequent to the Christmas break, where presentation of a restricted amount of side waste is acceptable.		NM&D District Council cannot collect side waste due to H&S and manual handling risks. Household Recycling Centres are available for such circumstances.	x	
Other (Please detail). If selected, please provide evidence to justify your response.	Householders with medical conditions – e.g. dementia who may not be able to recycle should be considered.			

Proposal 2: To require local Councils to collect a core set of dry recyclables from households to help avoid confusion and improve consistency and the quality of recyclable material.

1. Do you agree that the core set of materials comprising dry recycling collections by councils should comprise as the list below, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should not be included. Please state which ones and why.	Unsure
Paper and card, including newspaper, cardboard packaging, writing paper etc.	x		
Glass bottles and jars – including drinks bottles, condiment bottles, jars, etc. and their metal lids	x		

Metal packaging: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes	x		
Plastic: bottles including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays; plus cartons (such as Tetrapak®)	x		

2. Do you agree with our proposal that will require the kerbside collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

☐ Yes

☒ No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

☐ Unsure

The feasibility of adding materials not currently included in collections, or altering the way materials are collection is largely dependent on contractual arrangements and the timings of new contracts. Given the scope of potential changes at the kerbside, Councils may need to implement a phased program to manage such adjustments effectively, which may not align with the proposed 24-month timeframe.

3. Some Councils may not be able to collect the core set of dry recyclables by the date proposed. In the table below we set out some circumstances which may delay changes to recycling collections. Please provide evidence with justification why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for dry recyclable collection	x
Sorting or reprocessing	N/A
Procurement processes for new containers or vehicles	x
Manufacturing capacity for new containers or vehicles	x
MRF infrastructure or capacity	x
Container distribution	x
End Market volatility/lack of end markets	x
Other – please describe	The roll out of new bins requiring bin delivery and removal on a large

	<p>scale as there is a limited market for this type of support, therefore if all Councils were to commence a collective roll out, the 24 month proposed period may not be achievable.</p> <p>Section 5 (page 23) of the Consultation notes grant support of up to 50% of eligible capital costs available which would be insufficient to deliver such transformational change. This allocation is also significantly short of financial support packages offered by other regional UK governments.</p>
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Proposal 3: That additional materials are added to the core set over time when feasible, with flexible plastic packaging set to be collected from households by the end of the financial year 2026/2027.

1. As plastic films will need to be added to the core set of dry recyclables by no later than 31st March 2027, please state how you propose plastic films should be collected at the kerbside, ensuring quality and quantity of other dry recyclables. Select one of the options below (tick box)
 - ☐ Collected as a separate stream from all other recyclables, and from residual waste i.e., in a dedicated bag or container,
 - ☐ Collected in a container alongside other plastics – bottles, pots, tubs, and trays,
 - ☒ Collected mixed with other dry recyclables in the same container,
 - ☐ Unsure
 - ☐ Other (please detail and explain your reasoning for this proposal with supporting evidence)

It should be noted that the implementation of pEPR has been delayed by 12 months, hindering Councils, MRF's, and reprocessors from planning for the introduction of soft plastics into collections. This delay, coupled with uncertainties around finances, assessments of efficient collections, and the inclusion of business packaging in the scope of pEPR, has complicated forward planning. Despite these challenges, the FPF FlexCollect Project has demonstrated that flexible plastics can be collected through both kerbside sort and commingled bin collections. This involves using single-use plastic bags to consolidate flexible plastics, with trials planned for loose collections. Success of these trials depends on the participation of MRF's and the availability of sustainable end destinations for reprocessing the collected plastic. However, issues remain, such as the high ink levels on plastic films and the need for further sorting of different plastic film types to maximise economic benefits for reprocessors. These issues are exacerbated by Northern Ireland's lack of proximity to reprocessing facilities, regardless of the collection system chosen for flexible films.

2. Collecting plastic films by the 31st March 2027 may be challenging for some Councils. In this table we set out some circumstances which could affect a Council's ability to collect plastic film by this date. Please provide evidence with justification detailing why this timescale will be challenging.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for plastic film collection	x
Sorting or reprocessing	x
Procurement processes for new containers or vehicles	x
Manufacturing capacity for new containers or vehicles	x
MRF infrastructure or capacity	x
Container distribution	x
End Market volatility/lack of end markets	x
Factors relevant to collections from flats and houses in multiple occupation, where citizens share communal containers	x
Other – please describe	<p>x</p> <p>NI's distance from potential reprocessing markets.</p> <p>NI is unlikely to generate enough material to support the development of local reprocessing facilities.</p>

	<p>The costs associated with providing and distributing 'survival bags' for collections must be fully covered by pEPR payments to ensure these efforts are viable.</p> <p>The delayed implementation of pEPR has created uncertainty about payment for plastic packaging, hindering forward planning for incorporating this material into sorting contracts.</p>
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3. Do you agree that the list of materials to be collected as a minimum by councils should be regularly reviewed, and providing certain conditions met, expanded?

- ☒ Yes
☐ No
☐ Unsure

If you disagree with this proposal then please provide the reason for your response below with clear evidence on why you do not agree with regular reviews of the minimum list and why the list should not be expanded, provided certain conditions are met.

EPR and DRS will most likely affect the composition of packaging with a move towards more recyclable materials. Therefore it is important that the list of materials to be collected as a minimum be reviewed with inputs from the waste treatment/reprocessing sector. Effective communication with Councils and the waste treatment sector will ensure a clear understanding, leading to efficient collection of new materials and confirmation of their market value.

Newry, Mourne and Down District Council note that the implementation of any changes to the core set of materials following a review period must consider contractual arrangements.

4. If the proposal for a minimum list of materials to be collected for dry recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

☐ Yes
☒ No
☐ Unsure

If you answered "No," then please provide the reason for your response below. Your response should include clear evidence as to what frequency of review would be more appropriate.

Newry, Mourne and Down District Council note that the implementation of any changes to the core set of materials following a review period must consider contractual arrangements. To ensure stability, Councils are likely to seek longer term MRF sorting/processing contracts, and thus the proposed 2-year period for reviews would not be achievable. The implementation of new collection containers and the associated education of householders on such change in containers would take more than 2 year to accomplish.

It is essential to consider how the additional costs of collecting new core material will be offset.

5. What, if any products or materials do you consider should be also included in the core list of materials to be collected by councils? Please provide your response in the box below as to why the list should include the material (s).

We believe that Councils cannot be expected to manage the collection of an increasing variety of recyclable waste without a plan for covering the additional collection and processing costs. Prior to the implementation of new materials there must also be confirmation that there is clear market and value.

6. Do you agree that the materials comprising the items below should be *excluded* currently from the minimum list of materials for collection by councils within dry recycling collections?

Type	Examples	Agree. Items listed in the row should be excluded from recycling	Disagree. Items listed in the row should <u>be included</u> for recycling. Please state which items	Unsure
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			should be included and why	
Glass	<p>Ceramics, for example crockery, earthenware</p> <p>Drinking glasses</p> <p>Flat glass</p> <p>Glass cookware including Pyrex®</p> <p>Light bulbs and tubes</p> <p>Microwave plates</p> <p>Mirrors</p> <p>Vases</p> <p>Window glass</p>	x		
Metal	<p>Laminated foil, for example pet food pouches, coffee pouches</p> <p>General kitchenware, for example cutlery, pots, and pans</p> <p>Any other metal items, for example kettles, irons, pipes, white goods</p>	x		
Plastic	<p>Any plastic packaging or non-packaging items labelled as "compostable" or "biodegradable" (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections.</p> <p>Plastic pouches with laminated foil layer for example pet food pouches, coffee pouches</p> <p>Plastic bottles containing white spirits, paints, engine oils and anti-freeze.</p> <p>Bulky rigid plastics such as garden furniture, bins, and plastic toys</p>	x		

	Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging			
Paper and card	Absorbent hygiene products (AHPs) including nappies, period products and incontinence items. Cotton wool, make up pads Tissue/toilet paper Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning	x		
Any other items – please state which items and why they should be specifically excluded from recycling				

7. Do you agree that the core list of materials in the dry recycling stream should apply to all households, including flats and houses in multiple occupation, where citizens share communal containers?

- ☒ Yes
☐ No
☐ Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to issues with collection of named materials from communal settings such as containment, contamination, engagement with citizens.

NM&D District Council agree that the core list of materials in the dry recycling stream should apply to all households including flats and houses in multiple occupation where citizens share a communal bin. However, we also want to note the potential difficulties associated with communal containers. Due to the potential for contamination.

Proposal 4: To highlight NI's unique legislation on the quality of dry recyclable materials, the proposed term QualiTEE should be adopted to describe the exceptions to collecting dry recyclable materials separately.

1. Do you agree with our proposal that the term QualiTEE should be used to describe the process of determining if there may be an exception to collecting dry recyclable materials separately?

☐ Yes

☒ No - If no, your response should include clear evidence as to why the term QualiTEE is not your preference. Evidence with justification for alternative terminology should be provided.

☐ Unsure

Newry, Mourne and Down District Council are concerned with this proposal as the new concept of QualiTEE had not been raised within prior discussion documents or Council workshops. This concept of 'QualiTEE' appears to place primary focus on the quality of recyclable materials over quantity with little agreed definition on what is meant by quality. We also note the unique Northern Ireland legislation on separate collections (page 22) which does not include card/cardboard to be collected separately from other recyclable materials. The absence of this waste stream from the list of key recyclable materials raises confusion as to the criteria in place for defining these categories and therefore we question the exclusion of card/cardboard as a key recyclable material.

We must also note that many NI Councils are at current operating the commingled system and note that DAERA's own evidence (LACMW Reports) shows that Councils who operate the fully commingled system are the top performing Councils in relation to household waste recycling.

We believe that investment in the development of MRF infrastructure/AI technology for the commingled collection will lead to the efficient separation of dry recyclables, producing recyclable material of suitable quality. This approach utilises a collection methodology already well-established in Northern Ireland and would reduce the need for capital investment (i.e., collection vehicles/containers). Any material reprocessed through a recognised end user should be seen as 'comparable quality' regardless of the kerbside collection method used.

It should be noted that two of the top three NI reprocessors have limited capacity for reprocessing the total materials produced from NI householders. Huhtamaki can reprocess only 19% of the total paper produced and Cherry Plastics can only reprocess 18% of the NI volume of the specific plastics they require. These figures relate to the percentage of the volume of LACMW paper and plastic that each of these Northern Ireland reprocessors can accept. Therefore 81% of paper and 82% of plastic would need to be exported outside of Northern Ireland as there are no other reprocessors in NI. (NOTE: This does not take account of the extra volume of these wastes that will be produced by the Non-Household Sector. This area requires substantial development and investment in order improve the NI Circular Economy.

We also wish to note the Re-Gen memo produced in response to the presentation made to the APG Climate Action Group Meeting on 3rd May 2024 by Keep Recycling Local. This memo stated that their process has a comparable and better-quality output material for paper, plastic and other materials. They also noted that they sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. They confirmed that a £30 million spend on a modern glass plant in NI could achieve better recycling locally as an alternative option to the implementation of the kerbside sort collection. We would question why such proposals have not been included within this consultation as an alternative option.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is "sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials". NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation. It is also noted that "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.

Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils. This approach should also extend to all other waste collection services.

We also raise concern for the undefined concept of 'efficient and effective' collections within pEPR and question how equity can be ensured if Northern Ireland adopts a 'QualiTEE' definition that exceeds the standards required of other UK Councils.

Proposal 5: The default position for collection of dry recyclables from households is in four separate streams.

1. As per the default position do you agree that councils should be required to collect "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection?

☐ Yes

☒ No

☐ Unsure

If you disagree with this proposal, then please provide the reason for your response below. Ideally, your response should include clear evidence of how recyclables

streams can be successfully collected including methods to preserve quality for recycling, the quantities and proportions of materials sent for recycling, both for closed and open loop processing.

NM&D District Council does not agree with the default position that councils should be required to collect "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection.

It is very concerning that the 'default position' proposed i.e. four separate streams, surpasses the options discussed in earlier Recycling Discussion Documents and Council workshops. Previously, the 'separate' proposals focused on separating glass and/or paper from other materials which still would have caused difficulties, however not to the extent of this newly proposed 'four separate stream' collection system. Waste collection and management represents the largest expenditure for Councils annually. In light of the current economic climate, any additional costs beyond the existing collection/management expenses are unsustainable without full funding to cover these extra expenses, in perpetuity. Implementing this more intricate system without guaranteed financial support would place an untenable burden on Local Authorities, jeopardising their ability to manage waste effectively. Therefore, securing 100% funding for the additional costs is imperative for the successful adoption of any new system.

Councils are uniquely positioned to know what will work best for their residents and therefore DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is *"sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials"*. NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation. It is also noted that *"The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect"*. We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.

The commingling of dry recyclables would follow the recent updates of the Simpler Recycling Guidance being defined as the 'common-sense approach.' It is our opinion that the Kerbside Sort option is not well accepted by the public and by forcing this collection system would result in a reduction in public participation and thus a reduction in recycling.

Please see Annex 1 for further information in response to Proposal 5.

2. Do you agree with our proposal that will require the core set of dry recyclables to be collected separately from each other in the dry recycling collection (i.e., multi-stream) within 24 months of notification of a statutory requirement and/ or notification of Extended Producer Responsibility funding allocation?

☐ Yes
☒ No
☐ Unsure

If you disagree with this proposal, then please provide the reason for your response below. Your response should include clear evidence as to why the dry recyclables cannot be collected separately from each other within the proposed timeframe. Evidence with justification to extend timescales should be provided, if appropriate.

NM&D District Council does not agree with the default position that councils should be required to collect "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection.

Councils are uniquely positioned to know what will work best for their residents and therefore DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

Proposal 6: Standardised written assessments are prepared by councils where two or more dry recyclables are mixed during the collection process, evidencing why separate collections are not practicable and that co-collection delivers recyclable material of comparable quality.

1. Where councils cannot collect each dry recyclable waste stream separately, do you agree that the council should produce a written assessment and make available to the NI Environment Agency to outline the exception (s) to the requirement, on the basis of Comparable Quality, Technical Feasibility, Economic Costs and Environmental Outcomes (QualiTEE).

☐ Yes
☒ No
☐ Unsure

If you disagree with this proposal, then please provide the reason for your response below.

NM&D District Council disagrees with this approach. The above proposal is a significant diversion from DEFRA's Simpler Recycling Guidance. We believe that an imposed separate collection of recyclables or further administrative burden to justify the use of the current best performing system (commingling) would add significant cost burden on Council finances and would therefore divert resources that could otherwise be directed towards improving recycling infrastructure, public education, and other measures to further enhance the achievements already obtained through the implementation of the commingled system.

We note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is *"sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials"*.

Council is unclear as to what is meant by "the council should produce a written assessment and make available to the NI Environment Agency." This proposal is unclear and does not provide enough detail on what status such a written assessment would have, if NIEA would have to 'approve' proposals and any mechanism for appeal in the event of a disagreement between Council analysis and that of NIEA officials.

It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.

Please refer to Annex 1 for further information in response to Proposal 6.

2. Where councils cannot collect the dry recyclable waste streams separately, do you agree that the council should provide a written assessment based on the template shown in Appendix 2 to outline the exception (s) to the requirement?

- ☐ Yes
- ☐ No – further content should be added.
- ☒ No – content should be removed.
- ☐ Unsure

If you disagree with this proposal then please provide the reason for your response below, including your suggested amendments to the template.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

The Government response to outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' also confirms that they *"propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect"*. This 'co-collection' featuring a minimum of three bins per household (dry recyclables, organic, residual) provides a straightforward method for residents, eliminating the confusion of sorting. Additionally, having only three bins reduces the number of containers residents need to manage, decreasing storage clutter. This efficient system saves space and simplifies waste management for residents, fostering a more orderly routine. We propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.

Please refer to Annex 1 for further information in response to Proposal 6.

3. Do you agree or disagree with the recommendation that Councils should review and re-submit written assessments at least every 7 years?

☐ Yes

☒ No

☐ Unsure

If you disagree, please select one of the following statements that best describes why:

☐ Revising written assessments every 7 years is too frequent (please state how frequently you think they should be revised and evidence why)

☐ Revising written assessments at least every 7 years is too infrequent please state how frequently you think they should be revised and evidence why)

☒ Other (please detail)

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

The Government response to outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' also confirms that they "propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". This 'co-collection' featuring a minimum of three bins per household (dry recyclables, organic, residual) provides a straightforward method for residents, eliminating the confusion of sorting. Additionally, having only three bins reduces the number of containers residents need to manage, decreasing storage clutter. This efficient system saves space and simplifies waste management for residents, fostering a more orderly routine. We propose that similar exemptions be implemented in Northern Ireland.

It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.

Please refer to Annex 1 for further information in response to Proposal 6.

Proposal 7: A set of conditions should be set out that define comparable quality, best environmental outcome, technical feasibility, and disproportionate economic cost- "QualiTEE". Where conditions are met, an exception may apply, and two or more recyclable waste streams may be collected together from households.

Proposal 7a: Similar guidance on MRF sampling, to that used in England and Wales, should be introduced in NI to ensure that the quality of input and outputs for MRFs can be quantified.

1. In terms of disproportionate economic costs, to demonstrate if there is an excessive cost to collect recyclable waste in separate waste streams, do you agree that the following factors should be provided and evidenced by the council:

Factors	Yes agree	No disagree. If you disagree, please provide information as to why you disagree, providing clear evidence of why the	Unsure

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		factors should be included/ excluded.		
Gate fees and material income		X	NM&D District Council is not	
Salaries and staff numbers - including supervision		X	supportive of the requirement to provide any form of	
Container costs, numbers, and replacements		X	written assessment in relation to not collecting dry	
Vehicle types, costs, finance, depreciation, hire, running costs		X	recyclable streams separately from each other.	
Quantities of materials collected, frequency of collection		X	The Government response to outcomes of the DEFRA Consultation on	
Associated overheads including depot costs		X	'Consistency in Household Recycling in England' also	
Contract length, penalties associated with variations		X	confirms that they "propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". This 'co-collection' featuring a minimum of three bins per household (dry recyclables, organic, residual) provides a straightforward method for residents, eliminating the confusion of sorting. Additionally, having only three bins reduces the number of containers	

		<p>residents need to manage, decreasing storage clutter. This efficient system saves space and simplifies waste management for residents, fostering a more orderly routine. We propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.</p> <p>It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.</p> <p>Please refer to Annex 1 for further information in response to Proposal 6.</p>	
Other (please detail)	X We raise concern for the lack of reference to H&S		

	<p>issues throughout the consultation document.</p> <p>The proposed four-stream approach can only be executed via a kerbside sort system, which places a risk on the health and safety and well-being of associated staff.</p>		
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2. Do you agree that the following factors should be considered when evaluating economic costs:

Factors	Yes agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Adverse environmental costs	X		
Adverse health impacts	X		
Potential for efficiency improvements	X		
Revenues from sales of secondary raw materials	X		
Application of the polluter pays principle	X		
Application of Extended Producer Responsibility	X		
Other – please detail	<p>The quantity of waste left in the residual collection and the associated costs of dealing with a greater volume of residual waste.</p> <p>Costs associated with staff training and sick</p>		

	days / claims associated with manual handling injuries.		
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3. Do you agree that economic costs could be considered to be disproportionately excessive on a method of calculating an average cost per household deviation from a standard separate collection system cost?

☐ Yes

☒ No

☐ Unsure

If no, please provide information as to why you disagree, providing clear examples of alternative approaches to define excessive cost differences between systems, including a value you consider appropriate to differentiate economic impacts.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Due to the different ways Council report costs it is not possible to benchmark Council waste collection costs. Differences between what is included in Council costs will mean it is impossible to provide a meaningful benchmark. Waste collection and management represents the largest expenditure for Councils annually. Due to the current economic climate and waste collection/management accounting for the largest Council annual expenditure, any cost above the current collection costs are undeliverable without 100% funding for the additional costs. Due to the different ways Councils report costs it is not possible to benchmark Council waste collection costs. Differences between what is included in Council costs will mean it is impossible to provide a meaningful benchmark.

It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.

4. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all properties.

We are greatly concerned about DAERA's position in the Consultation document that people or historical preferences do not fall within the scope of technical feasibility, given that public participation is crucial to the success of recycling schemes. Councils have a statutory approach to take into account the views of their residents in the delivery of services and to carry out related Equality Impact Assessments and Rural Needs Analysis to ensure fair and inclusive practices. It is our opinion that if a separate collection of recyclables was enforced, public participation in recycling would decrease, and reduced recycling rates would be the result. NM&D District Council delivers services to local ratepayers and are therefore duty bound to take into consideration feedback from these ratepayers when designing and delivering services.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

We also note that Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only legislate/stipulate what should be achieved in terms of targets. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

Technical challenges that would prevent the separate collection of dry recyclables include the following:

- Providing service to isolated rural properties;
- Available storage space containers;
- Difficulties associated with using the separate container system for certain residents (i.e., elderly residents or those residents with a disability that prevents bending down to access the bottom boxes);
- Weather related issues for collection containers (i.e., windy conditions in exposed areas). This also relates to health & safety concerns with boxes being blown onto live traffic;
- Health & safety concerns for collection crews and associated manual handling injuries;
- Unsuitability of separate collection for commercial type properties preventing a harmonised service delivery model for Council commercial customers.

Please refer to Annex 1 for further information in response to Proposal 7.

5. In order to make the case that separate collection does not deliver the best Environmental Outcome—compared to the collection of recyclable waste streams together, do you agree that the overall impact of the management of the household waste stream evidence should be provided on the measures listed but not limited to the following:

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Measures	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Quantities of materials collected;		X	NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.
Quantities of materials classed as contamination and not recycled;		X	
Quantities of materials lost from sorting processes at a MRF;		X	
Vehicle emissions from collection rounds;		X	
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas;		X	
Emissions from disposal/treatment including savings arising from landfill diversion; and		X	
Carbon savings from using recycled materials rather than virgin materials		X	It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.

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			Councils are uniquely positioned to know what will work best for their residents and therefore DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.	
Other factor to be added – please describe	<p>Carbon impact resulting from the required replacement of waste receptacles for both production of new containers and disposal of old containers (which may be disposed of prior to their normal expected lifespan) to facilitate the proposed separate should be considered.</p> <p>Impact associated with the production of waste associated with broken collection containers.</p> <p>Carbon impact from a greater number of HGV's required to complete the collection of waste</p>			

6. Do you agree that the following evidence factors should be provided by a Council to demonstrate that materials are of comparable quality.

Evidence Factors	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Comparable quantities (+/-2%) of each		X	

material stream sent for closed loop recycling			There is a lack of an agreed definition on what is meant by quality.	
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling		X	<p>We believe that investment in the development of MRF infrastructure/AI technology for the commingled collection will lead to the efficient separation of dry recyclables, producing recyclable material of suitable quality. This approach utilises a collection methodology already well-established in Northern Ireland and would reduce the need for capital investment (i.e., collection vehicles and containers). Any material reprocessed through a recognised end user should be seen as 'comparable quality' regardless of the kerbside collection method used.</p> <p>This proposal also appears to assume that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. An assessment needs to be conducted to ascertain that if all Councils moved to this collection method, then the end destinations utilised would deliver more closed loop recycling.</p> <p>We believe this is an issue for MRF operators to offer solutions in order to deliver quality recycling to either Open or Closed loop</p>	

		<p>destinations based on market conditions.</p> <p>We note the Re-Gen memo produced in response to the presentation made to the APG Climate Action Group Meeting on 3rd May 2024 by Keep Recycling Local. This memo stated that their process has a comparable and better-quality output material for paper, plastic and other materials. They also noted that they sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. They confirmed that a £30 million spend of glass plant in NI could achieve better recycling locally as an alternative option to the implementation of the kerbside sort collection. We would question why such proposals have not been included within this consultation as an alternative option.</p>	
Other factor to be added – please describe	It is important that clear metrics are established for assessing the quality of recyclates as this will allow Councils to ensure clear quality standards which can then be integrated within contracts. DAERA need to engage with Local Authorities and waste processors to clearly define the benchmark of +/-2% for closed loop recycling and +/-5% for open loop recycling. It is important to note that the export of recyclates to a closed loop reprocessor may be more sustainable and carbon efficient than keeping materials local and in open loop recycling.		

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes, Technical

feasibility, or Economic Costs) which could be used to support a written assessment, would be useful?

☐ Yes

☒ No

☐ Unsure

If you disagree, please provide the reason for your response.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

It should be noted that any significant changes to the method for kerbside collections would require a detailed options appraisal and an associated business case. This would include an analysis of technical, economic, and environmental feasibility. All of this additional assessment would place further burden upon Councils.

Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

Standard default values in relation to environmental outcomes will be based on averages that may not provide an accurate representation of the carbon impact of the plants that local authorities are sending their waste to. Standard default values would be useful if they are specific to Northern Ireland and represent the collections rounds and technologies available here, rather than being based on averages from England or elsewhere.

8. Do you agree with the principle that MRFs in NI should follow the same input and output sampling guidance used as part of Environmental Permitting Regulations in England and Wales?

☐ Yes

☐ No

☒ Unsure

If no, your response should include clear evidence as to why similar sampling protocols to England and Wales should not be followed in NI?

Consideration must be given to the cost/benefit of such sampling, if these costs are to be covered by EPR payments etc.

Proposal 8: The quality of recyclate for reprocessing is important and needs to be improved through changes to collections and clear measures should be set to describe quality.

1. Which of the following options are your most preferred scenarios concerning the mixing of materials? Please rank the following options 1 (most preferred) to 4 (least preferred). If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s). Please focus on comparable quality of materials, rather than economic costs or technical feasibility of collections. You will note that we have set out clearly in the options which streams are separate, and which are mixed. If you are not sure or have no preference, please skip this question.

Options	Ranking (1 – most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
Option A – “three stream” <ul style="list-style-type: none"> • Separate stream of glass bottles & jars; with • Separate stream of paper & card; with • Mixed stream of: metal packaging and plastics bottles, tubs, and trays 	4	The preferred option is Option D as improvements in MRF technology can provide quality recyclates adequate for the re-processors. Option A would involve high operational costs, and also placed increased risk to the well-being and health & safety of collection crew.
Option B – “two stream: fibres out” <ul style="list-style-type: none"> • Separate stream of paper & card; with • Mixed stream of: metal packaging, plastic bottles, tubs and trays and glass bottles & jars 	2/3	Option D below can provide quality recyclates adequate for the re-processors rather than this option.
Option C – “two stream: glass out”	2/3	Option D below can provide quality

Options	Ranking (1 – most preferred; 4 – least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
<ul style="list-style-type: none"> Separate stream of glass bottles and jars; with Mixed stream of: metal packaging, plastics bottles, pots & trays, and paper & card 		recyclates adequate for the re-processors rather than this option.
Option D –“fully co-mingled” <ul style="list-style-type: none"> Mixed stream of: metal packaging plastics bottles, pots, tubs & trays, paper, card, and glass bottles & jars 	1	Please refer to Annex 1 which details the performance of the fully commingled system.

Proposal 9: Commingled collection of plastics and metals should be exempt from requirements to collect these materials as separate fractions.

- Do you agree that Councils may have an exemption from the regulations where they mix plastics and metals, thus should not be required to prepare a written assessment to seek an exception from the regulations where these two materials are collected together? Note that a Council may still select to collect these recyclable waste streams as separate materials.

☐ Yes

☐ No – all material streams should be collected separately.

☒ No – more mixing of materials should be permissible.

☐ Unsure

If you answered no, please provide information as to why you disagree, providing clear evidence as to why you consider all material streams should be collected separately, or more mixing should be permissible.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

NM&D District Council agree with the proposed exemption allowing for the collection of plastic and metal together. However, we seek clarification on how these exemptions align with Northern Ireland's legislation and why similar exemptions cannot be granted for other materials.

It is important to note that DAERA's own evidence (LACMW Reports) shows that Councils who operate the fully commingled system including glass are the top performing Councils in relation to household waste recycling.

2. What, other exemptions would you propose to the requirement to collect the recyclable waste streams separately, where it would not significantly reduce the potential for recycling? Please provide your evidence in the box below.

NM&D District Council is not supportive of a requirement to collect recyclable waste streams separately from each other or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Councils are uniquely positioned to know what will work best for their residents and believe DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils.

NM&D District Council agree with the proposed exemption allowing for the collection of plastic and metal together. However, we seek clarification on how these exemptions align with Northern Ireland's legislation and why similar exemptions cannot be granted for other materials.

Proposal 10: Revisions to household food waste collections to increase capture rates and improve the diversion of food waste from disposal should be introduced, ensuring all householders, including those living in flats, can recycle more and in time have access to separate, weekly food waste recycling collections.

1. We have listed possible collection methods for food waste from kerbside properties below, some of which we consider are suitable short term. How would you rank the following options for food waste collections, where 1 is most preferred and 4 is least preferable? If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s).

Options	Ranking (1 – most preferred; 4 – least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence or statements in support of your preferred selection for your ranking
A separate weekly collection of food waste with additional arrangements for garden waste		
A weekly mixed food and garden waste collection.		
A separate fortnightly collection of food waste with additional arrangements for garden waste.		
A fortnightly mixed food and garden waste collection.	1	<p>Please refer to Annex 1 regarding the performance of the mixed food and garden waste collection.</p> <p>The requirement for weekly separate food waste collections should not be assessed until the impact of restricting residual waste capacity can be assessed in moving food waste away from residual waste bins and into the existing comingled food and garden waste bins.</p> <p>It is our opinion that a restricted residual waste capacity combined with increased communication with</p>

		residents to use the brown bin in the residual bin, would effectively remove food waste from the residual waste bin.
Other – please detail		

Should DAERA insist on enacting legislation for the more expensive weekly separate food waste collection option, perpetual funding from central government would be necessary to cover the increased costs associated with implementing the new model.

2. Do you agree with our proposal that all kerbside properties should in future have access to a least a weekly collection for food waste to increase capture rates of food waste?

☐ Yes

☒ No

☐ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Evidence shows that the collection of food and garden waste captures comparable quantities of food waste to a separate collection. Please see Annex 1 for information on this. Therefore, we believe that measures should be implemented to encourage a greater diversion of food waste from the residual bin through restriction of residual waste capacity and funding to allow the provision of caddy liners free to all households in Northern Ireland.

It should also be noted that WRAP have acknowledged that the commingled biowaste schemes in Northern Ireland are among the most effective/best performing in the UK. The 2017 NI Waste Compositional Study confirmed that during the first phase (Summer), more food waste (1.07kg/hh/week) was collected from the commingled schemes in comparison to separate collections (0.92kg/hh/week). When an average of the first (summer) and second (winter) phases are taken the difference is marginal with an average of 1.2 kg/hh/week from commingled schemes compared to 1.28 kg/hh/week from separate food waste collections. We therefore question how it can be justified the substantial costs associated with switching to separate weekly food waste collections. It should also be considered, the potential impact on recycling rates across Northern Ireland should a separate weekly food collection be imposed as the continued separate collection of garden waste would no longer be feasible.

The requirement for weekly separate food waste collections should not be assessed until the impact of restricting residual waste capacity can be assessed in moving food waste away from residual waste bins and into the existing comingled food and garden waste bins.

NM&D District Council is not convinced of the need for weekly separate food waste collections with preference for greater diversion of food waste through restricting residual waste capacity at kerbside and robust communication methods making it clear that no household in Northern Ireland should dispose of any food waste via their residual waste collection service. Should DAERA insist on enacting legislation for the more expensive weekly separate food waste collection option, perpetual funding from central government would be necessary to cover the increased costs associated with implementing the new model.

3. Do you agree that all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to at least a weekly collection for food waste?

☐ Yes

☒ No

☐ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

NM&D District Council agree that all households including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to a food waste collection but that the minimum standard should be a fortnightly collection.

4. Do you agree that councils should be required to implement a weekly food waste collection service from kerbside properties, keeping food and garden waste separate, by the points in time listed below?

Time Period	Yes	No	If you answered no, please provide the reason for your response with clear evidence such as collection contracts, treatment contracts, treatment infrastructure capacity (AD/IVC), cost burden, reprocessing, end markets.	Not sure
24 months from notification of a statutory requirement		x		
3 to 4 years from notification of a statutory requirement		x		
More than 4 years from notification of statutory requirement		x		
Never	x		<p>NM&D District Council is not convinced of the need for weekly separate food waste collections with preference for greater diversion of food waste through restricting residual waste capacity at kerbside and robust communication methods making it clear that no household in Northern Ireland should dispose of any food waste via their residual waste collection service.</p> <p>The requirement for weekly separate food waste collections should not be assessed until the impact of restricting residual waste capacity can be assessed in moving food waste away from</p>	

			<p>residual waste bins and into the existing comingled food and garden waste bins.</p> <p>A separate weekly food waste collection could not be implemented without full funding of both capital and revenue costs associated with the operation.</p> <p>We believe that a separate food waste collection could compromise the viability of the garden waste collection which could result in garden waste within the residual bin.</p>	
Other – please detail				

5. Do you agree that guidance should be provided on caddy liners, including on caddy liner material types?

☒ Yes

☐ No

☐ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Cost of caddy liners should be covered by funding.

6. Do you agree that caddy liners should be provided free of charge to citizens that participate in food waste collection? (Please select only one option)

(1) Yes, via Council offices, libraries, leisure centres etc	
(2) Yes, as in (1) and via citizens adding their own note to their food waste containers to request new liners which crews deliver	
Yes, as in (1) and via a tag supplied in the roll of caddy liners that is attached to the food waste container by the citizen when their supply is low. Crews deliver new liners.	
Other method – please detail	X
No – citizens should purchase their own liners	
Not sure	

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

While Council agrees that caddy liners should be provided free of charge to citizens to facilitate diversion of food waste the method of this distribution should be down to each Council to determine.

Proposal 11: Through collaboration with Councils, we will set out proportionate and robust guidelines for compliance and enforcement that enable Councils to enhance their waste and recycling services.

1. Do you agree that section 21 of the Waste and Contaminated Land (Northern Ireland) Order 1997, as amended, should be clarified to set out the circumstances in which Councils can enforce householders to place items of waste and recycling in certain receptacles and the levels of fixed penalty notice that could be levied where householders do not comply?

☐ Yes

☐ No

☒ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

While clarified circumstances of enforcement would be welcome, NM&D District Council believes that education and awareness initiatives should come before enforcement measures.

We are greatly concerned about DAERA's position that people or historical preferences do not fall within the scope of technical feasibility, given that public participation is crucial to the success of recycling schemes. Failure to consider people and historical preferences could result an unpopular kerbside collection service being forced on members of the public. The use of fines and increased enforcement activities on householders could have an adverse impact and lead to a negative public perception of kerbside recycling services and an associated reduction in participation and the quantity and or quality of material collected.

More clarity would also be required on who would be responsible for Regulation and Enforcement and what resources would be available to facilitate this.

2. Do you agree that the following options should be adopted to help to improve the quality of recycling collected from households:

	Yes	No – if no, please state why	Unsure
Issuing standardised information in the form of leaflets to citizens at least annually		<p>NM&D District Council acknowledge the benefit of this; however we must also note the associated cost to design, print and deliver such information to residents. Funding for financing of such communications would need to be guaranteed.</p> <p>It is also important to note the emissions impact from leaflet production and delivery.</p> <p>Councils are best placed to make informed decisions on the nature and frequency of communications.</p>	
Crew training on how to manage containers with the wrong items		Councils are best placed to	

		make informed decisions on what training is required for staff who deliver the service.	
Oversight of crew working practices		Councils are best placed make informed decisions on what supervision is required for staff who deliver the service.	
Better support to crews and recognition of their work		Councils are best placed to make informed decisions on the support and recognition required for staff who deliver the service.	
Clear and updated visually appealing websites		Councils are best placed to make informed decisions on the nature and frequency of communications.	
Other - please detail			

3. If a Fixed Penalty Notice system were to be levied where people continue to put the wrong items in their recycling containers, which of the values proposed for the Fixed Penalty Notice do you consider to be appropriate?

	About right	Too low	Too high	Unsure
£50				x
£75				x
£100 (existing value)				x

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£150				x
£200				x
Other value you feel is appropriate – please detail	We note that Councils as service providers to local ratepayers are not often in the best position to undertake enforcement activities on services paid for by the householders they would be enforcing against. Enforcement should only be used as a last resort.			

Any other comments – please detail	
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Proposal 12: Non-Statutory Guidance will be provided to councils to expand the opportunities to recycle more materials and to embed best practice in existing services.

1. Do you agree that Non-Statutory Guidance would be useful as a framework on good practice collections from kerbside and communal dwellings, HWRCs and bring sites?

☒ Yes

☐ No

☐ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

NM&D District Council would welcome the provision of Non-Statutory Guidance. All outcomes in relation to the proposals in the consultation should be on the basis of Non-Statutory Guidance, as Local Councils are best placed to make informed decisions of their waste collection systems and policies, based on their detailed understanding of the conditions/needs of their community.

2. Do you agree that the following topics should be included in Non-Statutory Guidance to Councils on collections:

Topic	Yes	No – if no, please provide details on why you consider this topic not to be relevant	Unsure
Collection of hazardous waste from HWRCs		Councils should not be placed	

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		under any obligation to accept hazardous materials at HRCs.	
Collection of textiles, batteries, WEEE from the kerbside and communal properties		Not collected at kerbside.	
Collection of cooking and engine oil from the kerbside		Not collected at kerbside.	
Collection of AHPs (nappies, incontinence products) from the kerbside	X		
Standardised arrangements for assisted collections from the kerbside	X		
Standardised price ranges and arrangements for bulky waste collections		NM&D District Council do not support guidance on pricing as a standardised approach is impractical. Each Council has unique contracts, operational circumstances, and service delivery environments that would affect allocating an appropriate price for their service.	
Standardised arrangements for replacement containers		This assumes that all Councils would use the same types/sizes of containers.	

Standardised arrangements for excess recycling		This would be dependent on Council policy.	
Other – please detail	Any guidance should be developed in consultation with Councils, as their expertise is crucial for a fully informed consideration of these issues.		

PART 2: PROPOSALS TO IMPROVE CONSISTENCY IN RECYCLING FROM BUSINESSES AND THE WIDER NHM SECTOR

Proposal 13: The scope of the revised definition of municipal waste would include mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households. Specifically, wastes from production, agriculture, forestry, fishing, septic tanks and sewage network and treatment, including sewage sludge, end-of-life vehicles or waste generated by construction and demolition activities, are excluded.

1. Do you agree with the list of **out-of-scope** waste producers, who will **not** be obligated to segregate a core set of dry recyclables from their residual waste?

☐ Yes

☒ No

☐ Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

NM&D District Council agree with the revised definition of municipal waste and exemptions, we believe waste from any offices associated with the administration of such businesses should be included in any requirement to segregate dry recyclables from residual waste.

Proposal 14: Businesses and the wider non-household municipal (NHM) sector will be required to segregate from residual waste a core set of dry recyclables, to improve recycling behaviour and activity and ensure consistency between what people can recycle at home, at school and at work.

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1. Do you agree with the contents of the list below, detailing the materials that should be included in the core set of recyclable streams collected separately from businesses and NHM producing premises by waste collectors, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should <u>not</u> be included for recycling. Please state which ones should be excluded and why.	Unsure
Paper and card, including newspaper, cardboard packaging, office, writing paper etc;			While we agree that businesses should be required to recycle a core set of dry recyclables, we do not support DAERA mandating the use of four separate streams. Businesses and waste collection service providers should have the flexibility to design their own services, provided that dry recyclables, food waste, and residual waste are collected separately.
Glass bottles and jars – including drinks bottles, condiment bottles, jars etc and their metal lids			
Metals: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes			
Plastic bottles – including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays plus cartons (such as Tetrapak)			

2. Do you agree with the contents of the list below, detailing those materials that should be excluded currently from the core set of dry recyclables and therefore not collected by waste collectors from obligated businesses, public bodies, and other organisations, as a minimum?

Material	Items proposed to be excluded	Agree. All items listed in	Disagree. Items listed in the row should be included for	Unsure

		the row should be excluded from recycling	recycling. Please state which items should be included and why.	
Glass	Ceramics, e.g., Crockery or earthenware Drinking glasses Flat glass Glass cookware including Pyrex Light bulbs and tubes Microwave plates Mirrors Vases Window glass	x		
Metal	Laminated foil i.e., pet food pouches, coffee pouches General kitchenware i.e., cutlery, pots, and pans Any other metal items, i.e., kettles, irons, pipes, white goods	x		
Plastic	Any plastic packaging or non-packaging items labelled as "compostable" or "biodegradable" (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections. Plastic pouches with laminated foil layer i.e., pet food pouches, coffee pouches Plastic bottles containing white spirits, paints, engine oils and antifreeze. Bulky rigid plastics such as garden furniture, bins, and plastic toys	x		

	Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging			
Paper and card	Absorbent hygiene products (AHPs) including nappies, period products and incontinence items. Cotton wool, make up pads Tissue/toilet paper Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning	x		

3. Do you agree that the list of materials to be collected as a minimum should be regularly reviewed, and providing certain conditions met, expanded?

☐ Yes

☒ No

☐ Unsure

If you disagree with this proposal, then please provide your reason with supporting evidence in the box below.

The implementation of any changes to the core set of materials must take into account operational and contractual constraints, especially after a review period. The primary goal of introducing a core set of recyclables for dry recycling from businesses and the NHM sector is to provide uniform collections from, businesses, homes, schools etc. However, it is unclear how this will be achieved given that Councils in Northern Ireland are solely responsible for household collections, whilst the commercial sector is predominantly serviced by private sector waste management companies (Councils provide a service to a relatively small number of businesses).

The enforced introduction of additional core materials could lead to increased costs for the collection and treatment of these materials. This may impact business models and the ability of some contractors to continue offering their services. Additionally, it could create contractual issues with customers, all of which require further consideration.

4. If the proposal for a minimum list of dry recyclable materials to be collected for recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

☐ Yes

☒ No

☐ Unsure

If you answered "No" please provide the reason for your response. Your response should include clear evidence as to what frequency of review would be more appropriate.

Newry, Mourne and Down District Council note that the implementation of any changes to the core set of materials following a review period must consider contractual arrangements. A 2 yearly review is too often and would place a significant cost burden on businesses with limited time for previous changes for collection systems / materials to integrate. There would need to be flexibility for implementation of changes following review to take into account operational and contractual constraints.

5. What, if any, other products or materials do you consider should be also included in the minimum list of materials to be collected by waste collectors from obligated businesses, public bodies, and other organisations? Please provide your response in the box below and clear evidence as to why the list should include the material(s).

Councils cannot be expected to accommodate the collection of an ever-increasing variety of recyclable waste without consideration for how the additional costs of collection and processing will be managed.

Proposal 15: Subject to the costs being covered by packaging EPR (pEPR) and confirmation that the material can reasonably be collected for recycling, additional materials will be added to the core set over time, with businesses and NHM producing premises to be required by legislation to segregate flexible plastic packaging for recycling no later than March 31st, 2027.

1. Do you have any views on how plastic film should be collected from obligated businesses, public bodies, and other organisations?
- ☐ Collected as a separate stream from all other recyclables, and from residual waste i.e., in a dedicated bag or container,
 - ☐ Collected in a container alongside other plastics – bottles, pot, tubs, and trays,
 - ☒ Collected mixed with other dry recyclables in the same container
 - ☐ Other (please detail and explain your reasoning for this proposal with supporting evidence)
 - ☐ Unsure

Considering that the implementation of pEPR for households is currently postponed, and business packaging is not under consideration until the scheme is reviewed in 2026/2027 at earliest, it is uncertain how adequate planning can be conducted to incorporate these materials by no later than 31/02/2027.

2. Collecting plastic films from all obligated businesses, public bodies and other organisations by the 31st March 2027 may be challenging. using the list below please select those reasons which you believe will affect the ability to collect plastic film by this timeframe from businesses and NHM producing premises.

Please provide evidence with justification, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations	x
MRF infrastructure and/or capacity	x
Inability to resource and mobilise within the timeframe	x
Cost Burden to obligated businesses, and NHM producing premises	x
Reprocessing availability	x
End Market volatility/lack of end markets	x
Other – please describe	

Proposal 16: The Food Waste Regulations (Northern Ireland) 2015 will be revised to require all NHM premises which generate food waste, to be required to segregate food waste from their residual waste for recycling. An additional two years to implement such changes will be granted for small and micro sized businesses.

1. Do you agree with our proposal that will require the separate collection of food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement?
 - ☐ Yes
 - ☒ No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.
 - ☐ Unsure

While Council agrees, in principle that businesses generating enough food waste should be required to separate this from residual waste and dry recyclables, but note that the collection system operated should reflect that of what is in place for householders.

2. Do you agree that the Food Waste Regulations (Northern Ireland) 2015 should be extended to require all obligated businesses, public bodies, and other organisations to segregate food waste for separate collection?

☐ Yes, I agree - the Regulations should be extended to cover all obligated businesses, public bodies and other organisations, no matter of their size or nature. (If yes, go to Q7)

☒ No, I disagree – the Regulations should not be extended to cover all obligated businesses, public bodies or other organisations, no matter of their size or nature, some exemptions or phasing should apply.

☐ Unsure

3. If you disagreed, do you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations?

☒ Yes

☐ No (If no, go to Q5)

☐ Unsure

If you have answered no, please explain why you have this view, supplying evidence to justify your opinion.

4. If you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations, what parameter should be used to determine the de minimis amount? Please select from the list provided.

☒ 0-5kg of food waste per week

☐ 5kg+ food waste per week

☐ Other (please specify and provide evidence to support your proposal)

5. If you disagreed, do you believe that exemptions or phasing should be applied to the amended Food Waste Regulations (Northern Ireland) 2015 for some obligated businesses, public bodies, and other organisations? Please select the option that most closely represents your view and provide evidence to support your comments.

- **Option 1** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be exempt from any requirement to segregate food waste from other waste streams.
- **Option 2** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be given two additional years to comply with the new requirements (i.e., compliant 4 years post the legislative enactment)

If neither of the above options represents your view, please detail your view providing the reason for your response, and indicate if appropriate how long obligated businesses, public bodies, and other organisations, would require before they can segregate a core set of recyclables for recycling.

6. If you disagreed, do you believe that some obligated businesses, public bodies, or other organisations should not be required to segregate food waste for collection due to their nature, please detail the reason for this view, supplying evidence to justify your opinion.

7. To what extent do you agree that the measures we have proposed will increase the recycling of food waste from obligated businesses, public bodies, and other organisations? Please provide evidence to support your answer if possible.

☐ Strongly agree

☐ Agree

☒ Neither agree nor disagree

☐ Disagree

☐ Strongly disagree

☐ No opinion

We believe that DAERA, must allocate sufficient resources for communication and enforcement within the business sector, alongside establishing effective waste data reporting mechanisms to assess and oversee compliance. This responsibility should be funded and executed by the central government, as Councils cannot be burdened with additional regulatory duties without the necessary resources to fulfil them.

8. Are there any further measures that you would like to see included over and above our proposals that would improve the recycling of food waste by obligated businesses, public bodies, and other organisations? Please provide supporting evidence for any proposed measures.

Proposal 17: For separately collected food waste from businesses and the wider NHM sector, anaerobic digestion is our preferred method of treatment.

1. We propose that anaerobic digestion is the preferred method for treating separately collected food waste, where suitable, but composting is also permitted. Do you agree with this view?
☐ Yes
☒ No
☐ Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

It is our opinion that DAERA should evaluate whether designating AD as a treatment technology unfairly skews the free market, hindering service providers' ability to offer appropriate treatment solutions for compostable materials, potentially leading to legal challenges, such as from in-vessel composting businesses. Mandating AD as a preferred treatment option could impede the advancement of alternative treatment technologies.

Proposal 18: Recyclables produced by businesses and the NHM sector should be collected separately from residual waste, and separately from each other, unless comparable quality is achieved through co-collection of materials beyond plastics and metals only, and separate collection is not technically feasible, incurs disproportionate economic costs or does not deliver the best environmental outcome; or if a permitted exemption to this requirement is set out in legislation.

1. Do you agree that obligated businesses, public bodies, and other organisations should be required to segregate each of the following dry recyclables for collection and recycling?

Core recyclable	dry	Example	Yes, agree	No, disagree	Unsure/ no opinion
Separate bottles and containers	glass	Including drinks bottles, condiment bottles, jars, etc.		X	
Separate and card	Paper	Including newspaper, cardboard packaging, writing paper, etc.		X	
Separate and metals	Plastics	Including drinks containers, detergent, shampoo and cleaning products, pots, tubs & trays, etc. Steel and aluminium tins and cans, including aerosols Drinks cartons (i.e., Tetrapak)		X	

2. Do you have any other comments to make on the separate collection of dry recycling from businesses and the NHM sector?

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is "sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials". NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation. It is also noted that "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments..

It should be noted that small businesses will most likely not have the available capacity to store multiple containers, making the proposed multi-stream collection totally unfeasible.

Proposal 19: Proposals on conditions where an exception may apply, and two or more recyclable waste streams may be collected together from businesses and the wider NHM sector, which would be required two years following a requirement in legislation to collect NHM recycling separately. In the interim, waste carriers would be encouraged to have regard to the principle of QualiTEE.

1. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all NHM sector premises.

DAERA should continue to set the criteria/standards for businesses to meet (e.g. core set of materials to be separated from the residual waste collection) The decision on which collection system is best suited for their circumstance should be up to each individual NHM sector premises.

Whilst Councils have a duty to offer services to NHM organisations that request waste and recycling services they can only do so on the basis of cost recovery and existing design of services. If the service is to be provided by the Council, then the collection system must reflect that provided to households. If unable to or found to be less efficient in offering segregated waste collections, NHM premises would be required to arrange waste collection services from the private sector. It is important to highlight that certain town/city centre or smaller businesses may face space limitations, making it challenging to store multiple bins. Currently many NHM premises have their waste collected by private sector services, which typically involve a mixed dry recyclable collection, a residual collection, and a separate food waste collection for those who require it. Therefore, a waste collection system requiring a minimum of three containers emerges as the most appropriate, user-friendly, and efficient choice.

2. To make the case that separate collection does not deliver the best Environmental Outcome compared to the collection of recyclable waste streams together, do you agree that evidence on the overall impact of the management of the NHM sector waste stream should be provided on the measures listed but not limited to the following:

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Quantities of materials collected;	X		
Quantities of materials classed as contamination and not recycled;	X		
Quantities of materials lost from sorting processes at a MRF;	X		
Vehicle emissions from collection rounds;	X		
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas;	X		

Emissions from disposal/treatment including savings arising from landfill diversion; and	X		
Carbon savings from using recycled materials rather than virgin materials	X		
Other factors to be added – please describe	<p>NM&D District Council do not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>DAERA should continue to set the criteria/standards for businesses to meet (e.g. core set of materials to be separated from the residual waste collection) The decision on which collection system is best suited for their circumstance should be up to each individual NHM sector premises. However, if the service is to be provided by the Council, then the collection system must reflect that provided to households. If unable to or found to be less efficient in offering segregated waste collections, NHM premises would be required to arrange waste collection services from the private sector. It is important to highlight that certain town/city centre or smaller businesses may face space limitations, making it challenging to store multiple bins. Currently many NHM premises have their waste collected by private sector services, which typically involve a mixed dry recyclable collection, a residual collection, and a separate food waste collection for those who require it. Therefore, a waste collection system requiring a minimum of three containers emerges as the most appropriate, user-friendly, and efficient choice.</p> <p>Within the updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England it is noted that <i>"The Secretary of State has the power to set an exemption</i></p>		

	<p>from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments.</p> <p>The carbon impact resulting from the required replacement of waste receptacles for both production of new containers and disposal of old containers (which may be disposed of prior to their normal expected lifespan) to facilitate the proposed separate should be considered. The impact associated with the production of waste associated with broken collection containers should also be considered.</p>
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3. Do you agree that the following evidence factors should be provided by a waste carrier to demonstrate that NHM sector recyclable materials are of comparable quality?

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling		X There is a lack of an agreed definition on what is meant by quality or comparable quality.	
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling		X We believe that investment in the development of MRF	

		<p>infrastructure/AI technology for the commingled collection will lead to the efficient separation of dry recyclables, producing recyclable material of suitable quality. This approach utilises a collection methodology already well-established in Northern Ireland and would reduce the need for capital investment (i.e., collection vehicles and containers). Any material reprocessed through a recognised end user should be seen as 'comparable quality' regardless of the kerbside collection method used.</p> <p>This proposal also appears to assume that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation.</p> <p>We note our contractor Re-Gen produced a memo in response to the presentation made to the APG Climate Action Group Meeting on 3rd May 2024 by Keep Recycling Local. This memo stated that their process has a comparable and better-quality output material for paper, plastic and other materials. They also noted that they sell glass to both the UK and Belgium where it is</p>	
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			reprocessed back to bottle at a rate of 85%. They confirmed that a £30 million spend in a modern glass plant in NI could achieve better recycling locally as an alternative option to the implementation of the kerbside sort collection. We would question why such proposals have not been included within this consultation as an alternative option.	
Other factors to be added – please describe				

4. Do you agree with the distance factor of more than 3 miles from another obligated NHM organisation, whereby collectors should not be required to collect recycling separately?

☐ Yes
☒ No
☐ Unsure

If no, your response should include evidence as to why the distance factor is not appropriate and if relevant, supply information on an alternative distance.

If the service is to be provided by the Council, then the collection system must reflect that provided to households. If unable to or found to be less efficient in offering segregated waste collections, NHM premises would be required to arrange waste collection services from the private sector. Distance should not be a restricting factor as long as NHM collections could be delivered alongside household collections.

5. Do you agree that if the quantity of all core materials for collection is less than 3kg per week from one NHM organisation, then collectors should not be required to collect recycling separately?

☒ Yes
☐ No
☐ Unsure

If no, your response should include evidence as to why the quantity is not appropriate and if relevant, supply information on an alternative amount.

6. Which is your preferred option for collectors when requested to collect recycling where the distance to an obligated NHM organisation is above 3 miles or where the quantity of all core materials is less than 3kg per week? Please rank your preference where 1 is most preferred:

Preferred Option	Select Ranking (1-4, where 1 is most preferred)
Mixed recycling collections	2
Separate recycling collections using different coloured "survival sacks" which are collected in the same vehicle as residual waste, then managed apart from the residual waste after the vehicle tips off.	3
No recycling collections required, and a collector could direct organisations to alternative facilities.	1
Something else - please detail. We request clarification on what is meant by 'mixed recycling collections' within this proposal. If meaning a mixed domestic and NHM collection, we note the potential issues with digital waste tracking and allocation of mixed loads to either a domestic or non-domestic setting. The financial, operational and resource impacts on Councils must be considered.	

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes and Technical feasibility) which could be used to support a written assessment, would be useful?

☐ Yes
☒ No
☐ Unsure

If you disagree, please provide the reason for your response.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

Standard default values are rarely representative of all Councils in Northern Ireland due to differing populations and housing densities. Therefore, any values used must be a clear representation of the costs relevant to each individual Council.

Proposal 20: Written assessments should be completed by waste collectors that co-collect dry recyclables from NHM premises, evidencing why separate collections are not practicable and that co-collection delivers recyclable materials of comparable quality to those collected as separate fractions. Collectors must ensure that where they deviate from a standardised template, their output information attains the same evidential threshold. Regular reviews of such assessments should be undertaken to ensure that they remain accurate and up to date.

1. Where waste collectors do not collect dry recyclable waste in the permitted three segregated streams, do you agree that the collector should produce a written assessment based on the template shown in Appendix 3 to outline the exception (s) to the requirement?

- ☐ Yes
- ☐ No – further content should be added to the template.
- ☒ No – content should be removed from the template.
- ☐ Unsure

If you responded No, please provide the reason for your response below, including your suggested amendments to the template.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

We note the risk of placing additional administrative burden (written assessments) on the private sector as these companies may deem it as an unbeneficial additional cost and therefore cease to service smaller, less profitable contracts. The result would then be for these smaller businesses to revert to Council services for collection, thus placing further pressure on Councils, increasing the resources required.

There is a lack of an agreed definition on what is meant by quality. We believe that investment in the development of MRF infrastructure/AI technology for the commingled collection will lead to the efficient separation of dry recyclables, producing recyclable material of suitable quality. This approach utilises a collection methodology already well-established in Northern Ireland and would reduce the need for capital investment (i.e., collection vehicles and containers). Any material reprocessed through a recognised end user should be seen as 'comparable quality' regardless of the kerbside collection method used.

This proposal also appears to assume that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. In England, Simpler Recycling proposals will introduce new exemptions to allow waste collectors to collect dry recyclables together within the same container. This approach aims to create a more practical and convenient system, thereby protecting Councils and residents from the complications and costs of more complex collection systems. Additionally, it ensures that all Local Authorities will collect the mandated recyclable waste streams which include glass, metal, plastic, paper and card, food waste, and garden waste.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is "sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials". NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation.

The Rethinking Our Resources Consultation notes that "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of the onerous QualiTEE assessment.

2. Do you agree that reference to standard default values and data that have clearly referenced sources, which could be used to support a written assessment, would be useful?
 - ☐ Yes
 - ☒ No
 - ☐ Unsure

If you disagree, please provide the reason for your response with supporting evidence in the box below.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

Standard default values are rarely representative of all Councils in Northern Ireland due to differing populations and housing densities. Therefore, any values used must be a clear representation of the costs relevant to each individual Council.

3. Do you agree that waste carriers for NHM recycling should be encouraged to have regard to the principle of QualiTEE (and not required to conduct a written assessment) during the first two years following the introduction of legislation requiring separate NHM recycling collections?

☐ Yes

☒ No

☐ Unsure

If no, please provide information as to why you disagree.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

We note the risk of placing additional administrative burden (written assessments) on the private sector as these companies may deem it as an unbeneficial additional cost and therefore cease to service smaller, less profitable contracts. The result would then be for these smaller businesses to revert to Council services for collection, thus placing further pressure on Councils increasing the resources required.

There is a lack of an agreed definition on what is meant by quality. We believe that investment in the development of MRF infrastructure/AI technology for the commingled collection will lead to the efficient separation of dry recyclables, producing recyclable material of suitable quality. This approach utilises a collection methodology already well-established in Northern Ireland and would reduce the need for capital investment (i.e., collection vehicles and containers). Any material reprocessed through a recognised end user should be seen as 'comparable quality' regardless of the kerbside collection method used.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is "*sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials*". NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation.

The Rethinking Our Resources Consultation notes that *“The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect”*. We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of the onerous QualiTEE assessment.

This proposal also appears to assume that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. An assessment needs to be conducted to ascertain that if all Councils moved to this collection method, then the end destinations utilised would deliver more closed loop recycling.

4. Do you agree with the recommendation that waste collectors should review and re-submit written assessments at least every 2 years?

☐ Yes
☒ No
☐ Unsure

If you disagree, please select one of the following statements that best describes why:

- ☐ Revising written assessments every 2 years is too frequent (please state how frequently you think they should be revised and evidence why)
☐ Revising written assessments at least every 2 years is too infrequent (please state how frequently you think they should be revised and evidence why)
☐ Written assessments should be revised every time changes are made to the collection services delivered by the waste collector or the treatment facility, they use i.e., collection methodology utilised, access to a new recycling facility.
☒ Other (please detail providing evidence to support your opinion).

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

Please refer to our response to Proposal 20 Question 1.

5. Using a template to produce a written assessment and using standardised data should reduce the burden on waste collectors. What other ways to reduce the burden on waste collectors should we consider for the written QualiTEE assessment?

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

Confirmation from MRF's that the quality of recyclates produced are within the permissible comparable quantities for the separate collection of materials should be provided.

Please refer to our response to Proposal 20 Question 1.

6. Do you agree with the content of the written assessment template for collection of waste from obligated businesses, public bodies or other organisations as provided at Appendix 3?

☐ Yes

☒ No

☐ Unsure

If you disagree, please select any of the following that best describe why:

☐ Further content should be added (please comment)

☐ Content should be removed (please comment)

☒ Other (please comment)

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

Please refer to our response to Proposal 20 Question 1.

7. Do you have any other comments on the content for the written assessment template for non-household municipal collections?

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should be left to individual Councils and the private sector waste management companies offering NHM collections.

We also note confusion between the NHM draft template (appendix 3) consisting of 8 pages and the Household draft template (appendix 2) which consists of 3 pages.

Please refer to our response to Proposal 20 Question 1.

8. We are proposing that a waste collector should only need to produce one written assessment for each set of premises or rurality that they intend to employ an exception for. For 'set of premises', we have suggested that this would include at a national level, groups of premises on a collection route or type of premises, for example hospitality premises. Do you agree with the examples listed for 'set of premises'?

☐ Yes

☒ No

☐ Unsure (please comment)

If you disagree, please select one of the following statements that best describes why:

- ☐ Other examples should be added to the list (please comment)
- ☐ Examples should be removed from the list (please comment)
- ☒ Other (please comment)

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should left to individual Councils and the private sector waste management companies offering NHM collections.

Please refer to our response to Proposal 20 Question 1.

9. What other factors, if any, should be taken into consideration and included in the written assessment? For example, different premise type in a service/geographical area, costs of breaking existing contractual arrangements and/or access to treatment facilities.

NM&D District Council is not supportive of the requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

DAERA should only dictate/stipulate the targets that should be achieved or the core set of materials that must be collected at the kerbside. The decision on the most appropriate collection method to achieve such targets should left to individual Councils and the private sector waste management companies offering NHM collections.

Consideration must also be made for availability of space for the storage of multiple separate collection bins.

Please refer to our response to Proposal 20 Question 1.

Proposal 21: To introduce, or where existing, improve NHM recycling collections.

1. Do you agree that the range of proposals set out by DAERA in this consultation once implemented, will sufficiently ensure that NHM recycling collections focus on segregating recyclable waste from residual waste alongside improving the quality and quantity of recycling?

☐ Yes

☒ No - If no, your response should include clear evidence as to why you have this.

☐ Unsure

If the Council is to deliver recycling collection services to NHM organisations, then these must mirror the system provided to households.

NM&D District Council note the recent comments within the Government response to the outcomes of the DEFRA Consultation on 'Consistency in Household Recycling in England' where it states that there is "sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials". NM&D District Council therefore find it difficult to accept why the 'co-collection' of dry recyclable materials was not offered as an alternative option within the Rethinking Our Resources Consultation. It is also noted that "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass, and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We therefore propose that similar exemptions be implemented in Northern Ireland, avoiding the imposition of burdensome QualiTEE assessments..

We request clarification on who would be responsible for Regulation and Enforcement and on what resources would be available to facilitate this as Councils are already under considerable financial pressures and would not have the resources available to conduct such additional enforcement activities.

Proposal 22: We will continue to review and investigate options to reduce costs for businesses and NHM premises where possible to maximise their recycling behaviour and activity.

1. What are the main barriers that obligated businesses (small and micro-firms in particular), public bodies and other organisations face when trying to recycle? Please select one option for each barrier listed.

	Major Barrier	Some Barrier	Little/No Barrier	No opinion
Financial	x			
Contractual		x		
Space	x			
Engagement		x		
Location		x		
Time and expense of staff training		x		
Enforcement				Unclear what exactly is meant by this
Lack of awareness or understanding of how to recycle more waste		x		
Other				

Please provide further detail of these barriers and how you believe they can be overcome alongside any supporting evidence.

The business sector is better placed to articulate their actual barriers which may in fact vary from business to business.

We do note that many city and town centre businesses will not have sufficient storage space for a large number of separate waste bins. Therefore, a three bin model with comingled dry recyclates, food/garden waste, and residual waste would provide businesses with the most efficient and effective option for segregating their waste.

2. Which type(s) of business support do you believe would be most useful for obligated businesses, public bodies, and other organisations to ensure they understand their obligations and enable them to recycle more of their waste? (Select any number of responses)

	Very useful	Useful	Neutral	Not useful	No opinion
1:1 support provided/offered to obligated businesses and organisations	x				
National, regional, or local communications campaigns	x				
National guidance and good practice case studies	x				
Dedicated website including online business support tools (e.g., online calculator and good practice guidance)	x				
Other (please specify)	The business sector is better placed to articulate their barriers which may vary from business to business.				

3. If adopted, and it became a legal requirement for obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, how do you believe such regulatory change should be promoted or communicated?

	Please tick all that apply
National, regional, and local communications campaigns i.e., TV adverts, social media campaigns, adverts in trade, national or local press, webinars	x
Guidance and/or notification provided directly to all obligated businesses and organisations via the relevant regulatory bodies (local councils, NIEA) i.e., emails, written notification	<p>Councils lack the support and resources to enforce regulations requiring businesses to separate fry recyclables and food waste. They only handle a small fraction of business waste in Northern Ireland, making it unreasonable to expect them to regulate services beyond their statutory duties.</p> <p>If DAERA mandates a legal requirement for businesses and public bodies to separate key recyclables, including food waste, they (DAERA) should take full responsibility for promoting, communicating, and enforcing these changes. Councils do not have the staff or financial resources</p>

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	to manage additional enforcement related to the NHM sector. DAERA needs to consider this when implementing any new regulations.
Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector	x
Guidance and/or notification provided to obligated businesses and organisations via relevant trade bodies or umbrella associations, Chambers of Commerce etc. i.e., newsletters, social media, workshops, conferences, or webinars	x
Other (please specify)	

4. Do you have any views on how Government could support businesses, public bodies, or other organisations to procure waste management services more collaboratively?

	Tick all the options which you think should be considered
Promote existing collaborative opportunities relating to waste management so that businesses and NHM producers can access these easier	
Develop new procurement framework opportunities for waste management services that businesses and NHM producers can use collaboratively to gain best value	x
Develop standard contract templates that businesses and NHM producers can utilise to collaboratively source waste management services	x
Collaborate with key industry organisations or accredited associations to develop waste management framework opportunities suitable to specific industry sectors i.e., transport, retail, hospitality	x
Other (please detail and provide examples if possible)	

Proposal 23: Businesses and the NHM sector will be provided with a minimum two-year notification of a statutory requirement to collect dry recyclables as separate streams, segregated from residual waste, with a further phasing of such legislative requirements for small and micro businesses producing NHM waste.

1. Do you agree with our proposal that will require the separate collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

☐ Yes

☒ No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

☐ Unsure

The proposed 24 month timeframe may not be long enough for collectors to procure containers, vehicles and organise collections.

2. Do you agree that small and micro firms should be required to implement a separate collection of the core set of dry recyclables, by the points in time listed below? Tick the point in time which you think should apply.

	Yes	No	If you answered no, please provide the reason for your response with clear evidence detailing why small and micro firms need more time to accommodate the changes.	Not sure
24 months from notification of a statutory requirement				
3 to 4 years from notification of a statutory requirement				
More than 4 years from notification of statutory requirement				
Never				
Other – please detail	X		We note the need for consistent implementation timeframes across the entire NHM sector.	

3. Are there any other obligated businesses, public bodies or other organisations in your opinion that should be exempt from the proposed requirements?

Please provide evidence to support your view.

4. Some waste collectors may not be able to collect the required dry recyclable streams from all obligated businesses, public bodies and other organisations within the timeframe proposed. In this table we set out some circumstances which may delay changes to dry recycling collections. Please select the circumstances which you believe will create challenges and provide evidence with justification detailing why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations	Dependant on existing contracts and alignments with proposed implementation date.
MRF infrastructure and/or capacity	Sufficient capacity must exist by the proposed timeframe for implementation.
Container procurement and distribution challenges	X
Reprocessing availability	It should be noted that two of the top three NI reprocessors have limited capacity for reprocessing the total materials produced from NI householders. Huhtamaki can reprocess only 19% of the total paper produced and Cherry Plastics can only reprocess 18% of the volume of plastics produced from NI LACMW. These figures relate to the percentage of the volume of LACMW paper and plastic that each of these Northern Ireland reprocessors can accept. Therefore 81% of

	<p>paper and 82% of plastic would need to be exported outside of Northern Ireland as there are no other reproprocessors in NI. (NOTE: This does not take account of the extra volume of these wastes that will be produced by the Non-Household Sector. This area requires substantial development and investment in order improve the NI Circular Economy.</p>
End market volatility/lack of end markets	Open to market forces.
Cost burdens to collectors of setting up new or expanded collection services	I.e., additional vehicles and staff that would be necessary to implement such collections.
Other – please describe	<p>Available capacity (i.e., Transfer Stations and other infrastructure)</p> <p>Challenges related to vehicle procurement.</p> <p>The potential need for customised collections from the NHM sector not aligning with the service levels offered by Councils.</p>

Proposal 24: To review collection zoning and franchising to reduce costs to businesses and NHM premises.

1. Which recyclable waste streams do you believe should be included under a potential franchising/zoning scheme available for use by obligated businesses, public bodies, and other organisations?

For each option, please select whether you agree, disagree, or are not sure/do not have an opinion/not applicable.

	Agree	Disagree	Not sure/No opinion/Not applicable
Dry recyclable material streams (glass, metal, plastic, paper, and card)			We have no experience of zoning/franchising schemes so cannot offer an opinion in this regard.
Food Waste			
Other Items, for example oils, hazardous waste, bulky waste (please specify)			

2. Which of the below options, if any, is your preferred for zoning and/or collaborative procurement? Please select only one option that most closely aligns with your preference.

- ☐ Encouraging two neighbouring businesses to share the same containers under a contract.
- ☐ Encouraging businesses to use shared facilities at a site/estate or equivalent.
- ☐ Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in).
- ☒ Co-collection – the contractor for household collection services also delivers the NHM service.
- ☐ Framework zoning – shortlist of suppliers licensed to offer services in the zone.
- ☐ Material specific zoning – one contractor collects food waste, one dry recyclables, one residual waste.
- ☐ Exclusive service zoning – one contractor delivers the core recycling and residual collection waste services for the zone.
- ☐ None of the above.
- ☒ Other (please detail)

We have no experience of zoning/franchising schemes so cannot offer an opinion in this regard. We do note that where the Council is required to offer a collection service to the NHM sector, this must mirror the service delivered to households.

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3. Do you have any views on the roles of stakeholders in implementing a potential zoning/franchising scheme. Please tick where you think the named stakeholder should have a role in each of the following activities:

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Governmental Organisations	Waste producers i.e., businesses, public bodies etc	Trade body, Umbrella Associations, Accredited bodies	Other – please detail
Procurement of services								
Scheme/collection service design								
Admin and day to day management								
Enforcement (ensuring zoning rules are adhered to)								
Business support/advice								
Development of tools & guidance								
Delivery of communications campaigns								

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Consultation

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Governmental Organisations	Waste producers i.e., businesses, public bodies etc	Trade body, Umbrell a Associations, Accredited bodies	Other – please detail
Other activities General feedback								We have no experience of zoning/franchising schemes so cannot offer an opinion in this regard. We also note that we do not have the resources to take on any additional services and/or enforcement related to NHM waste.

4. If you think that there is a role for any other stakeholders not already listed, please name the stakeholder below and state what activities you believe they should be involved in.

We question why private sector waste collection companies have not been included in the stakeholder table.

5. Do you have any further views on how a potential waste or recycling collection franchising or zoning scheme could be implemented?

Councils should not be required to bid for Collection Zones, as their current routes and vehicles might already be fully utilised in servicing households. The decision to participate should be left to the Councils' discretion.

Proposal 25: To establish commercial waste bring sites and/or to increase the access to HWRCs for businesses, public bodies, and other organisations to encourage more recycling and better waste management.

1. Do you agree that obligated businesses, public bodies, and other organisations would find the provision of commercial waste bring sites useful to facilitate an increase in recycling?

- ☐ Yes
☐ No
☒ Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

If the establishment of commercial waste bring sites is preferred, several issues need to be addressed. These include determining suitable locations, specifying the types of materials to be accepted, assigning responsibility for the sites provision, and deciding how businesses will cover the costs under a cost recovery model for commercial waste services.

2. Are there any barriers which we should be aware of, regarding the creation and operation of commercial waste bring sites?
 - ☐ Lack of suitable location(s) to accommodate commercial waste bring sites.
 - ☐ Access restrictions – time, availability, vehicular access, noise
 - ☒ Risk of abuse which may cause recycling containers to fill up quickly.
 - ☒ Risk of contamination to recyclables meaning collected materials are less likely to be recycled.

- ☒ Sites encourage fly-tipping or litter.
- ☐ Other (please specify)

Will commercial waste bring sites have to be staffed to prevent unauthorized disposal of waste e.g. asbestos

3. Do you agree that obligated businesses, public bodies, and other organisations should be permitted to use HWRC's to dispose of their waste or recyclables?

- ☒ Yes
- ☐ No
- ☐ Unsure

If you disagree, please detail the reason for this view, supplying evidence to justify your opinion.

If you agree, what benefits do you believe access to HWRCs will provide to obligated businesses, public bodies, or other organisations? (Select as many benefits as are appropriate)

- ☒ HWRC access will provide a trusted, legitimate disposal route for our waste and recyclables.
- ☐ HWRC access will provide a cost-effective disposal route for our waste and recyclables.
- ☐ HWRCs will provide access to disposal routes for our waste and recyclables at times which suit our organisation (in line with the opening hours of the facility)
- ☐ HWRC access will enable us to recycle more of our waste due to the range of accepted materials.
- ☐ Other (please specify)

4. Are there any barriers, which we should be aware of, should HWRCs be made accessible to obligated businesses, public bodies, and other organisations?

- ☒ HWRC network has limited capacity for waste or recyclable storage - would be unable to accept predicted increase in volumes.
- ☒ Council(s) has/have insufficient resources to handle the anticipated increase in numbers of visits, waste volumes, payments or permits needed to cope with acceptance of commercial waste or recyclables.
- ☒ Existing Environmental Permit or planning condition for HWRC network would not permit a service expansion.

☒ Other (please specify)

While improving access to HRC's could increase recycling opportunities for businesses, we do note the following issues:

- If HRC's were to be provided for businesses, it would require substantial infrastructure investment. There should be no assumption that local Councils would develop and provide these facilities.
- Many sites already face capacity issues, and additional usage by local businesses could exacerbate these problems.
- Staffing challenges arise both in terms of on-site personnel needed to verify business usage administrative support, as no Household Recycling Centre will implement on-site payment due to fraud and bribery risks.
- The use of HRCs by businesses presents opportunities for misuse, where businesses may dispose of their commercial waste as household waste to avoid associated charges. Current legislation in Northern Ireland does not permit charging businesses such as landscapers and house clearance companies, for waste originating from household sources. This loophole allows businesses to deposit large volumes of waste for free, imposing significant costs and operational difficulties on Councils. Reviewing this legislation would help Councils close the loophole. This issue must also be considered in the context of proposed digital waste tracking systems.

Proposal 26: Amendments will be made to Article 5 of The Waste and Contaminated Land (Northern Ireland) Order 1997 to ensure compliance with the post-consultation requirements to segregate a core set of dry recyclables and food waste by obligated businesses and the wider NHM sector.

1. Do you agree that our proposal to extend Article 5 of the Waste & Contaminated Land (NI) Order 1997 will be sufficient to ensure compliance with the proposed requirements to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations?

☐ Yes

☒ No

☐ Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

Councils lack the support and resources to enforce regulations requiring businesses to separate fry recyclables and food waste. They only handle a small fraction of business waste in Northern Ireland, making it unreasonable to expect them to regulate services beyond their statutory duties.

If DAERA mandates a legal requirement for businesses and public bodies to separate key recyclables, including food waste, they (DAERA) should take full responsibility for promoting, communicating, and enforcing these changes. Councils do not have the staff or financial resources to manage additional enforcement related to the NHM sector. DAERA needs to consider this when implementing any new regulations.

2. Do you agree that the existing penalty of £300 for non-compliance for obligated businesses, public bodies and other organisations is severe enough to ensure compliance?

☐ Yes

☒ No

☐ Unsure

If you have answered No, what value do you feel the fixed penalty notice for non-compliance should be increased to?

Proposed new penalty value	Please select one answer
£400	
£500	
£600	
£700	X

If you believe another value should apply to fixed penalty notices for non-compliance, please specify the value you feel the fixed penalty should be set at and explain why, as well as providing supporting evidence.

Further discussion and consultation is needed on this.

ITEM 3
ARC21 JOINT COMMITTEE
Meeting No 86
MINUTES
Thursday 25 April 2024
Hosted by Ards and North Down Borough Council
at Bangor Town Hall

Members Present:

Councillor M Goodman (<i>Chair</i>)	Antrim & Newtownabbey Borough Council
Councillor A Givan	Lisburn & Castlereagh City Council
Councillor R Quigley	Mid & East Antrim Borough Council
Councillor G McKeen (<i>Deputy Chair</i>)	Mid & East Antrim Borough Council
Councillor T Andrews	Newry, Mourne & Down District Council
Councillor K Murphy	Newry, Mourne & Down District Council

Members' Apologies:

Councillor E McLaughlin	Antrim & Newtownabbey Borough Council
Alderman P Michael	Antrim & Newtownabbey Borough Council
Councillor C Blaney	Ards & North Down Borough Council
Councillor J Cochrane	Ards & North Down Borough Council
Councillor A Cathcart	Ards & North Down Borough Council
Councillor T Kelly	Belfast City Council
Councillor E McDonough-Brown	Belfast City Council
Councillor B Smyth	Belfast City Council
Councillor P Kennedy	Lisburn & Castlereagh City Council
Alderman S Skillen	Lisburn & Castlereagh City Council
Councillor A Wilson	Mid & East Antrim Borough Council
Councillor C Enright	Newry, Mourne & Down District Council

Officers Present:

T Walker	arc21
H Campbell (<i>Secretary</i>)	arc21
K Boal	arc21
B McKeown	arc21
J Green	arc21
M Lavery	Antrim & Newtownabbey Borough Council
W Muldrew	Lisburn & Castlereagh City Council
P Thompson	Mid & East Antrim Borough Council

Officers' Apologies:

D Lindsay	Ards & North Down Borough Council
S Leonard	Belfast City Council
R Harvey	Lisburn & Castlereagh City Council
S Murphy	Newry, Mourne & Down District Council

In Attendance:

Claire O'Prey & John Martin - AGRS, Belfast City Council
 Conor Hill - NI Audit Office

Item 1 - Conflicts of Interest, Gifts and Hospitality Statement

The Chair read out the Conflicts of Interest, Gifts and Hospitality Statement, and none were noted.

Action: Noted

Item 2 - Apologies

Apologies were noted.

Action: Noted

Item 3 - Minutes of Joint Committee Meeting 085 held on 28 February 2024

The Joint Committee approved the minutes. Proposed by Councillor Andrews, seconded by Councillor Murphy.

Action: Agreed

Item 4 - Matters ArisingWaste Management Plan Addendum

Mr Walker advised that a final draft had been received from the Consultants (RPS) which was circulated amongst the councils for accuracy and that several councils had responded with comments which had been fed back accordingly.

He noted that a first meeting had been held with DAERA to ensure that what was produced was sufficient to meet DAERA's expectations and it was anticipated that this would permit a final version to be presented to the Steering Group and Joint Committee meetings next month for consideration and then the Addendum could be considered through the governance cycles of the councils.

Members will be kept updated on developments accordingly.

Action: Mr Walker

arc21 Corporate Plan 2024-2028

Mr Walker advised that the new Corporate Plan was still under development, and it was anticipated that this would be finalised in time to bring it to the Steering Group and Joint Committee meetings next month for consideration. The Chair requested that every effort is given to realise this timescale.

Action: Mr Walker

arc21 annual seminar March 2024

Mr Walker reported that the arc21 annual seminar took place on 20 March 2024 and this had focused specifically on packaging and packaging waste. He advised that attendance could have been improved but all those who attended had found it informative. Feedback from the session had been positive.

Action: Noted

DfI Minister meeting

Mr Walker advised that, having considered the request to write to the Minister of Infrastructure to seek a meeting, this had not been actioned as arc21 is currently pursuing a planning application and any correspondence or communication with the Minister and their officials was likely to be posted onto the planning portal and may be seen as a form of lobbying. This could stimulate criticism from others.

However, he advised that arc21 is considering engaging with the DAERA Minister and, following a meeting with the DAERA officials on 26 April, we arrange to meet with the Minister to highlight the priority which needs to be accorded to the development of appropriate waste facilities at this time to accommodate the new policy landscape which is being proposed nationally.

Action: Noted

Joint Committee Meeting Thursday 28 March 2024

Mr Walker advised that this meeting did not take place due to the lack of a quorum.

Action: Noted

Item 5 - Contracts & Operations Briefing Report

Service Status

Ms Boal reported that all services were operational during February and March. During this time, Bryson requested to put their weighbridge contingency measures in place for one day due to technical issues, but these were promptly addressed, and the weighbridge was operational the next day with no further issues.

In March, NWP requested to contingency arrangements for the L&CCC Haulage contract for a few days due to mechanical issues with their vehicle, and there were no further issues to report.

Performance

She reported that turnaround times had been reviewed for February and March and, in most cases, the contractors provided adequate reasons. However, in February service credits were applied to ReGen and in March service credits were applied to Bryson due to some vehicles exceeding the required turnaround time as specified in their contracts.

She noted that the overweight vehicles continue to be monitored and, compared to January, they have decreased in all contracts in February. Compared to February, in March the number of incidents was similar for all contracts.

She advised that in February, all weekly and monthly reports were submitted on time and there were no issues. Bryson failed to inform arc21 when their weighbridge went down within the required timeframe as stated in their contract, and therefore service credits were applied. In March, all weekly and monthly reports were submitted on time and there were no issues.

In terms of the Bring Bank contract she reported that in February, there were 9 x requests for bring site rectifications (they did not have the specified capacity) and in March, there were 4 requests for bring site rectifications across all contracts. These were communicated with the contractors, and they confirmed on each occasion that they had been emptied within the required 48 hours. Therefore, no service credits were applied at this time.

Health & Safety

Incidents

During February and March 2024, Ms Boal reported that there were 8 Health & Safety incidents reported to arc21 by contractors. She advised that unfortunately these incidents seemed to be growing with a consistency in trends at sites.

She reported that due to these increases, arc21 is seeking to be proactive and had recently issued Health & Safety Alerts to councils, including adherence to traffic arrangements on site and incidents around hoppers, and that it is likely to issue another set next month. She advised that these Alerts were discussed with the Steering Group and feedback has been requested from officers.

She also advised that arc21 will be making available all site rules on the SharePoint platform for officers and contractors to access.

She reported that arc21 continues to ask the council officers to liaise with their Health & Safety officers and operational managers, including those of external contractors, to ensure that all their operational teams understand their Health & Safety obligations and that they abide by the site rules of each site.

Audits

Ms Boal reported that arc21's H&S consultant continues to carry out audits and in February, an audit was conducted with R Heatrick Ltd at ANDBC and the Sullatober Transfer stations, while in March, an audit was conducted with Irish Waste Services (IWS) at their Duncrue site.

There were some minor recommendations and actions identified on both audits. She noted that these reports had been shared with the contractor and arc21 was liaising appropriately to complete these as soon as possible.

Rejected Loads

In terms of rejected loads, she noted the following:

- 1 x rejected load into Bryson in February 2024;
- 1 x rejected load of separately collected glass into Bryson in March 2024.
- no rejected loads delivered into Organics delivery sites in February 2024; and
- 2 x rejected loads delivered into Organics delivery sites in March 2024.

Accordingly, officers had been requested to continue to review their protocols to ensure that systems are in place so that vehicles are fully emptied before collecting another material stream.

arc21 Contract Tonnages

A list of the contract tonnages for February and March 2024 was presented as follows:

February

- an increase of 5.2% for MDR material delivered into Bryson;
- a 10.4% increase for MDR material delivered to ReGen;
- a 29.1% increase for Type 1 organics material;
- an increase of 6% for Type 2 organics material; and
- a 13.3% decrease for the Landfill Residual Waste Contract.

March

- a 2.7% decrease for MDR material delivered into Bryson;
- a 11.8% decrease material delivered to ReGen;
- a 5.2% increase for Type 1 organics material;
- a decrease of 4.1% for Type 2 organics material; and
- a 27.8% decrease for the Landfill Residual Waste Contract.

She noted that no residual waste was sent direct to landfill by Belfast City Council (BCC) in February of March: following the cessation of their contract earlier in the year, Mid & East Antrim Borough Council (MEABC) bulky waste was sent direct to landfill in February and March.

Supplies

The summary of the aspects pertinent to the supplies contract were presented.

Following discussion, the Joint Committee noted the report.

Action: Noted

Item 6 - Waste Tonnage Trends

Ms Boal presented the waste tonnage trends for materials delivered into the arc21 contracts, including an overview of statistics in relation to percentage landfill and recycling against future targets and/or aspirations, in addition to the presentation of annual data.

Part A showed the monthly tonnage comparison for material processed through arc21 contracts since 2020/21, and she highlighted the following:

- landfill - following downward trend from February in comparison to last 3 years, which is a positive sign;
- Organics type 1 - slightly higher than the 22/23 year, but weather dependent;
- Organics Type 2 - following similar trajectory as 22/23 year; and
- MRF combined tonnage - slightly lower in March than 22/23 year.

Part B of the report focused on performance against potential future targets incorporating data for the period April to December 2022/23 year at an individual council level as well as collectively.

She advised that arc21 is starting to see the impact of the BCC contract, with a significant reduction of landfill becoming apparent and it is anticipated that similar patterns will emerge for the other councils as the interim residual contracts are awarded.

She noted that Part C of the report provides the tonnages delivered to arc21 contracts by each council over the last four years and highlighted the following:

- landfill - a couple of councils' waste increased mainly due to some waste going to landfill while arc21 is procuring the interim residual contracts, but the difference in BCC with their new contract for interim residual in place is now apparent. She noted that some councils' waste had dropped significantly, such as A&NDBC with the introduction of their management systems for their HRCs;
- Organics - generally weather dependent and councils are continuing to focus on removing food waste from the residual bin;
- MRF - shows stability across all councils and no great increases in tonnages.

The other contracts were also presented in graph form for information.

Following discussion, the Joint Committee noted the report.

Action: Noted

IN COMMITTEE

The Chair recommended that the meeting would now move "*in committee*" which was agreed. Proposed by Councillor McKeen, seconded by Councillor Murphy.

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

Following discussion on the commercially sensitive matters, the Chair recommended that the meeting would now return to the main agenda, which was approved, but whilst "*In Committee*" during this section of the meeting, there were 9 matters discussed.

Item 7 - Minutes of Joint Committee Meeting 085 held on 29 February 2024 'in committee' (*approved*)

Item 8 - Matters Arising (*noted*)

Item 9 - Commercially Sensitive Contract & Procurement Issues (*approved*)

Item 10 - Residual Waste Treatment Project (*noted*)

Item 11 - Audit Committee Report: Internal Audit progress report (*noted*)

Item 12 - Audit Committee Report: Risk Management Update (*noted*)

Item 13 - Audit Committee Report: AGRS Service Level Agreement 2024/25 (*approved*)

Item 14 - Audit Committee Report: Internal Audit Plan 2023/24 – 2026/27 (*approved*)

Item 15 - Audit Committee Report: NI Audit Office - Audit Strategy 2023/24 (*noted*)

OUT OF COMMITTEE

Proposed by Councillor Andrews, seconded by Councillor Quigley.

Item 16 - AOB

There was no further business discussed.

Item 17 - Next Meeting Thursday 30 May 2024 at 10.30am, hosted by Belfast City Council

Date: _____

Chairman: _____

Report to:	Sustainability and Environment Committee
Date of Meeting:	19 June 2024
Subject:	District Cleansing – summer season 2024 preparations
Reporting Officer (Including Job Title):	Sinead Murphy, Director: Sustainability & Environment
Contact Officer (Including Job Title):	Sinead Trainor, Assistant Director Environment

For decision		For noting only	X
1.0	Purpose and Background		
1.1	The purpose of this report is to inform members of the planned preparations for the 2024 summer season, to ensure adequate resources are deployed to maintain our District to a high standard throughout this period.		
2.0	Key issues		
2.1	Newry Mourne and Down District Council with its unique location and natural beauty is highly attractive to local and travelling visitors into its numerous attractions across the District. During the summer season the footfall in tourist areas increases significantly.		
2.2	The increased visitor numbers to the District brings with it an increase in the usage of litter bins and an increased generation of street litter. To ensure a positive visitor experience it is crucial that the standard of cleanliness is maintained to a high standard.		
2.3	<p>Officers within the Refuse and Cleansing section have developed cleansing plans to maintain a high standard of cleanliness, particularly in high profile tourist areas over the summer period.</p> <p>Areas covered by the plans, Newcastle, Warrenpoint and the Lecale coast, experience the highest numbers of visitors in the summer season and have been identified as requiring additional resources in this period. Increased resources are planned for around public holidays when footfall traditionally increases and to support the many varied events across the District.</p>		
2.4	<p>The plans utilise existing in-house resources to maintain normal cleansing schedules in the key areas. This is supplemented with seasonal resources to provide additional cleansing services in the evenings. At the following high peak times, additional crews will be deployed:</p> <ul style="list-style-type: none"> • July bank holidays week • August bank holiday weekend 		
2.5	<p>A contractor will be undertaking a deep clean in the coming weeks to paved areas in Downpatrick, Newcastle, Warrenpoint and Newry.</p> <p>In-house services will also continue to undertake regular maintenance of the above-mentioned areas to ensure that the high standard of cleanliness is maintained.</p>		
2.6	Additional resources can be provided, if required, from in-house resources on an overtime basis. This will provide officers with flexibility to respond to fluctuations in visitor numbers, for example, during periods of good weather.		

3.0	Recommendations
3.1	Members are asked to note the planned 2024 Summer Season Preparation plans outlined in 2.4 - 2.6.
4.0	Resource implications
4.1	Resourcing for the preparations will be funded from 2024/25 Waste Management budget and any additional costs resulting from an increased demand due to good weather and visitors to the area will be managed via the Waste Management budget.
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 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 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 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	None
8.0	Background Documents
8.1	N/A

