

**Democratic Services Section  
Chief Executive's Department  
Belfast City Council  
City Hall  
Belfast  
BT1 5GS**



**Belfast**  
City Council

5th August, 2019

**MEETING OF PEOPLE AND COMMUNITIES COMMITTEE**

Dear Alderman/Councillor,

The above-named Committee will meet in the Lavery Room - City Hall on Tuesday, 6th August, 2019 at 5.15 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

SUZANNE WYLIE

Chief Executive

**AGENDA:**

1. **Routine Matters**

- (a) Apologies
- (b) Minutes
- (c) Declarations of Interest

2. **Matters referred back from Council/Motions**

- (a) Glyphosate-Based Weed Killer (Pages 1 - 2)
- (b) Air Quality in Belfast (Pages 3 - 4)

3. **Committee/Strategic Issues**

- (a) Update in relation to a permanent memorial to mark Baby Haven in the City Cemetery (Pages 5 - 10)
- (b) Waste Framework Update, Household Recycling Performance and Response to Notice of Motion (Pages 11 - 32)

- (c) External Consultations on Packaging and Packaging Waste (Pages 33 - 134)
- (d) Pre Consultation to seek views on the successor strategy to the New Strategic Direction for Alcohol and Drugs Phase 2 (Pages 135 - 160)
- (e) NIHE Chronic Homelessness Action Plan 2019 Consultation (Pages 161 - 222)

4. **Physical Programme/Asset Management**

- (a) Waterworks Pitches (Westland) (Pages 223 - 226)
- (b) Facilities Management Agreement - Suffolk Football Club (Pages 227 - 230)
- (c) Request for review of Greater Village Regeneration Trust (GVRT) - Blythfield Lease (Pages 231 - 234)
- (d) Review of Management Arrangements for the pitch at Sally Gardens (Pages 235 - 238)

5. **Finance, Procurement and Performance**

- (a) Financial Reporting - Quarter 4 2018/19 (Pages 239 - 244)

6. **Operational Issues**

- (a) Proposal for naming new streets and the continuation of an existing street (Pages 245 - 248)
- (b) Proposal for dual language street signs (Pages 249 - 252)
- (c) Request for the hire of Botanic Gardens for a series of music events (Pages 253 - 258)
- (d) Request for the use of Cathedral Gardens for "Rally for Choice" (Pages 259 - 262)
- (e) CIWM (NI) Conference 2019: Life Beyond Plastics? (Pages 263 - 268)
- (f) Update on Green Flag and Green Flag Heritage Award (Pages 269 - 272)

7. **Issues raised in advance by Members**

- (a) Cavity Wall Insulation Research report - Cllr Heading to raise
- (b) Future Fossil Fuel Development - Cllr Smyth to raise

"This Council believes that in order to protect this planet from catastrophic climate breakdown, we must prevent average global temperatures rising above 1.5 degrees.

This Council agrees to reject all future fossil fuel extraction planning applications within the council boundary and promote sustainable development as enshrined in the Belfast Agenda."

- (c) High Hedge Complaints - Councillor McMullan to raise
- (d) Cloth Nappies - Councillor Mulholland to raise

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<b>Subject:</b>	Motion – Glyphosate Based Weed killer
<b>Date:</b>	6th August, 2019
<b>Reporting Officer:</b>	Sara Steele, Democratic Services Officer
<b>Contact Officer:</b>	Sara Steele, Democratic Services Officer

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report/Summary of Main Issues</b>
1.1	To bring to the Committee's attention the Motion in respect of: Glyphosate Based Weed killers which was referred to the Committee by the Council on 1st July.
<b>2.0</b>	<b>Recommendation</b>
2.1	The Committee is requested to <ul style="list-style-type: none"> <li>Consider the motion and take such action thereon as may be determined.</li> </ul>
<b>3.0</b>	<b>Main Report</b>
3.1	<p><b><u>Key Issues</u></b></p> <p>The Council, at its meeting on 1st July, considered the following Motion which had been moved by Councillor Ferguson and seconded by Councillor Matt Collins:</p>

	<p><i>“This Council recognises the dangers associated with the use of glyphosate-based weedkillers, including the World Health Organisation's warning about carcinogenic side effects and the damaging impact on the environment and biodiversity.</i></p> <p><i>The Council notes that other councils and government agencies have introduced bans across the world and agrees to immediately investigate and implement the use of safer weedkilling methods in order to protect Council staff, the general public, and local flora and fauna.”</i></p>
3.2	In accordance with Standing Order 13(f), the Motion was referred without discussion to the People and Communities Committee.
3.3	<p><b><u>Financial and Resource Implications</u></b></p> <p>None.</p>
3.4	<p><b><u>Equality or Good Relations Implications</u></b></p> <p>None.</p>
<b>4.0</b>	<b>Appendices - Documents Attached</b>
	None



<b>Subject:</b>	Motion – Air Quality in Belfast
<b>Date:</b>	6th August, 2019
<b>Reporting Officer:</b>	Sara Steele, Democratic Services Officer
<b>Contact Officer:</b>	Sara Steele, Democratic Services Officer

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report/Summary of Main Issues</b>
1.1	To bring to the Committee's attention the Motion in respect of: Air Quality in Belfast which was referred to the Committee by the Council on 1st July.
<b>2.0</b>	<b>Recommendation</b>
2.1	The Committee is requested to <ul style="list-style-type: none"> <li>Consider the motion and take such action thereon as may be determined.</li> </ul>
<b>3.0</b>	<b>Main Report</b>
3.1	<p><b><u>Key Issues</u></b></p> <p>The Council, at its meeting on 1st July, considered the following Motion which had been moved by Councillor O'Hara and seconded by Councillor Kyle:</p>

	<p><i>“This Council notes that the Department of Agriculture, Environment and Rural Affairs (DAERA) monitoring of Air Quality in Belfast has identified breaches of the Air Quality legal limits, alongside the Council’s own monitoring of and the data collected by Greens across the City.</i></p> <p><i>Poor Air Quality reduces life expectancy, increases incidents of respiratory conditions, rates of lung cancers, strokes and asthma. These are more prevalent amongst older people, younger people and vulnerable groups. In addition, this disproportionately impacts inner city and working class communities.</i></p> <p><i>In view of these issues and in support of all 5 objectives of the Belfast Agenda, particularly outcome 5 to make ‘Belfast a vibrant, attractive, connected and environmentally sustainable City’, the Council agrees to engage formally with DAERA and the Department for Infrastructure on the areas of concern and to produce reports on:</i></p> <ol style="list-style-type: none"> <li><i>1. Enhancing monitoring and reporting of air pollution, including recommended limits in line with the more stringent World Health Organisation Standards; and</i></li> <li><i>2. Introducing a Clean Air Zone in Belfast, in line with UK Government Guidance.”</i></li> </ol>
3.2	In accordance with Standing Order 13(f), the Motion was referred without discussion to the People and Communities Committee.
3.3	<p><b><u>Financial and Resource Implications</u></b></p> <p>None.</p>
3.4	<p><b><u>Equality or Good Relations Implications</u></b></p> <p>None.</p>
4.0	<b>Appendices - Documents Attached</b>
	None



<b>Subject:</b>	Update in relation to a permanent memorial to mark the Baby Haven in the City Cemetery
<b>Date:</b>	6 <sup>th</sup> August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City and Neighbourhood Services
<b>Contact Officer:</b>	Siobhan Toland, Director of City Services

## Restricted Reports

Is this report restricted?

Yes

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No

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If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	The purpose of this report is to update Members on the consultation process and progress to design, produce and install a permanent memorial at Plot Z1 in the City Cemetery, known as The Baby Haven.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>Note the final count of babies buried in the Plot as outlined in this report; and</li> <li>Agree to the holding of a ceremony to unveil the memorial as outlined in this report.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	Members are reminded that Plot Z1 is an area in the City Cemetery in which many babies are buried and that following requests from relatives of those buried in the plot, the Council agreed to the design and installation of a permanent memorial of the site. As part of the process it was agreed to establish a Focus Group, as an informal advisory body, made up of representatives of families who have relatives buried in the plot. Previous reports have outlined our partnership approach working with the Focus Group, to oversee the design in an efficient and effective manner which respects the sensitive manner but also cognisant of Council's protocols and policies.
3.2	Regular reports on the progress of this project were taken to the Strategic Cemeteries and Crematorium Development Working Group, and Members are reminded that a report was brought on 21 <sup>st</sup> November 2018 which detailed the final design and landscaping. In this report Members were advised that The Focus Group had requested that Belfast City Council confirm the number of babies buried in the plot and that this number be inscribed as part of the wording on the memorial. The Bereavement Administrative team has undertaken a detailed count of burial records for Plot Z1 and has validated this against original Burial Orders. The final verified number of babies buried in the Plot is <b>7,160</b> . This number was discussed with the Focus Group and was then provided to the sculptor. A copy of the design of the memorial is attached as appendix 1.
3.3	Ground works on site will commence in late July and it is anticipated that the memorial will be erected on site in early August. Following the installation of the memorial, the area around it will be landscaped and it anticipated that it will take a few weeks to undertake this. As is common practice a ceremony will be held to unveil the memorial and it is proposed that a request is made for the attendance of the Lord Mayor at the dedication event.
3.4	The Focus Group has requested that as part of this ceremony the Council organise a religious aspect to the ceremony as families were unable to hold funeral ceremonies for their babies when they were buried. As Members will appreciate there are babies of all faiths and none buried in Plot Z1 and therefore there are sensitivities around the holding of a religious ceremony. It is proposed that the Council takes advice from the Northern Ireland Inter Faith Forum to include an inclusive spiritual element within the ceremony that recognises the faiths of all those buried within the plot.

3.5	<p><u>Next steps</u></p> <p>Subject to Members' approval, it is planned that the commemorative and dedication event takes place in the middle of September. It is anticipated that given the number of babies buried in the plot that this event will be very high profile with attendance from across Northern Ireland. There has already been media interest in this project and it is likely that there will be continued interest in the unveiling ceremony.</p>
3.6	<p><u>Financial &amp; Resource Implications</u></p> <p>The associated costs are planned for and covered within respective revenue budgets</p>
3.7	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>Equality and good relation implications need to be considered when planning the commemorative and dedication event for September, particularly in relation to the request from the focus group for a 'spiritual event'.</p>
3.8	<p>To take a positive approach to the promotion of equality and good relations, facilitation of the event should include advice and guidance from the Northern Ireland Inter-Faith Forum, whose main aim is to promote mutual understanding between different faith traditions.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1 – Memorial design

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© Charlotte Howarth 26-4-18  
 Revised 24-6-18  
 Proposed Baby memorial  
 Carved Kilkenny limestone  
 Approx size 1500mm x 900mm x 380mm  
 Scale 1:5 @ A3

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<b>Subject:</b>	Waste Framework Update, Household Recycling Performance & Response to Notice of Motion
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw – Strategic Director City & Neighbourhood Services
<b>Contact Officer:</b>	Tim Walker – City Services Manager Brendan Murray – Waste Manager

## Restricted Reports

Is this report restricted?

Yes ☐ No ☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Sometime in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes ☒ No ☐

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	<p>To provide Committee with progress on implementing the Waste Framework, an update on household recycling performance over the recent past and to respond to the Notice of Motion raised at 1<sup>st</sup> November 2018 Council meeting which states that:</p> <p><i>“This Council is committed to increasing household recycling across the city of Belfast; notes the colossal impact waste is having on our oceans, cities and countrysides; welcomes the recent waste consultation; and will commit to introducing glass recycling in households across the city of Belfast as soon as possible.”</i></p>





<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ol style="list-style-type: none"> <li>1. Agree that the wheelie-box scheme outlined in this report is the strategic direction of travel for the Council, subject to a successful assessment of the project within the Council's Capital Programme.</li> <li>2. Agree the wheelie-box pilot as outlined to: <ul style="list-style-type: none"> <li>• approximately 5,000 households in North Belfast commencing September 2019;</li> <li>• change collection day for operational reasons and to mitigate against "<i>bin blight</i>." If considered necessary, these will be communicated in advance to the residents affected;</li> <li>• in order to improve recycling further, as per the January 2014 policy, the trial will implement one bin per household with the usual exceptions (i.e. larger families of 6 or more, and those households with a resident who has a medical condition which generates additional waste,) following the successful application to DAERA to fund an in-house trial.</li> </ul> </li> <li>3. Agree implementation of Phase 2 of the food waste campaign, as set out in the Council's Improvement Plan for 2019-20.</li> <li>4. Agree extending the existing WRAP Collaboration Agreement for the 2019/20 financial year.</li> <li>5. Agree to a Members' study visit to Welsh councils (as per November report) to see first-hand a kerbside sort approach, in operation.</li> <li>6. Agree to a study visit to businesses and organisations in NI which use the secondary materials collected from the Council's recycling operations and learn how they contribute to the local Circular Economy.</li> <li>7. Note the response to the November Notice of Motion.</li> </ol>
<b>3.0</b>	<b>Main report</b>
	<p><u>Key Issues</u></p> <p><b>Background</b></p>
3.1	<p>There are several drivers influencing management of the city's waste including:</p> <ul style="list-style-type: none"> <li>• legislative compliance;</li> <li>• fit-for-purpose and value-for-money services;</li> <li>• the Belfast Agenda – an additional 66,000 residents will generate additional waste; and</li> </ul>

	<ul style="list-style-type: none"> <li>the Circular Economy Package (CEP) focusing on higher recycling targets (65% municipal waste by 2035), improving quality of materials and contributing to jobs within the economy.</li> </ul>
3.2	To address these challenges the Council, and its regional waste management group (arc21), have developed waste plans, the most recent of which was the Waste Framework approved in June 2017. These plans make recommendations in terms of infrastructural and policy requirements with the primary aim of reducing reliance on landfill and increasing recycling.
3.3	Over the last 15 years, the Council has achieved increases in the recycling of household waste from 5% in 2003/04 to 44% in 2017/18 (the most recent NIEA validated year). This has been achieved by developing an adequate recycling infrastructure (Recycling Centres, bring banks, kerbside collection schemes) and associated contracts to treat the materials arising. In addition, the Council has invested consistently in communications and outreach activities to engage with residents and other partners such as schools, community groups and businesses to ensure that the “ <i>Reduce, Reuse Recycle</i> ” message is continuously promoted (see <b>Appendix 1, Figure 1</b> ).
3.4	In terms of performance, the city’s recycling rate increased steadily in 2014/15, when it peaked at 44%. This trend was halted following Local Government Reform as many of the 22,000 households which transferred to Belfast were relied heavily upon residual waste collections. In recent years, there have also been plant closures – reducing local capacity to treat wastes, changes in the legal definition of recycling and fluctuations in the national and international markets (sometimes erratic) which have impacted upon both commodity prices and destinations for recycled materials.
	<b><i>Current Performance</i></b>
3.5	With the introduction of the Food Waste Campaign in Summer 2017 and the focused targeting of this waste within the residual (black) bin, the recycling rate rebounded to 44% in 2017/18. In the same year, the household recycling rate across the whole of NI rose by 3.7% to 48.1%, bringing the 2020 national 50% target within reach.
3.6	In 2017/18, the Council was ranked 9 <sup>th</sup> in Northern Ireland for its household recycling rate. Given its different demographics and other characteristics (deprivation, housing type, etc) which impact on recycling rates, it should be noted that it is unrealistic to benchmark Belfast against the other councils in NI (see <b>Appendix 1, Figure 2</b> ).

3.7	As a result, Belfast benchmarks its performance against similar cities in England such as Newcastle, Sunderland and Sheffield. Examining those cities latest performance reveals that Belfast continues to outperform, although they have additional statutory duties to discharge and austerity and associated budget cuts have deeply affected these councils (see <b>Appendix 1, Figure 3</b> ).
3.8	In 2017/18, the total amount of household waste collected by the Council was 144,727 tonnes. Amongst the NI councils, Belfast produced the smallest amount of household waste per person, at 425kg and the smallest amount of waste per household, at 0.98 tonnes.
3.9	With the inclusion of non-household waste (commercial, fly-tipped/entry clearances) collected by the Council, the total amount of municipal waste collected rose to 169,368 tonnes. The treatment split for this waste was 40% recycled, 39% landfilled, 19% energy recovery and 2% other.
3.10	In total, around 68,000 tonnes of the municipal waste stream (household, commercial, street sweeps, fly tipped) was recycled. This supports the Belfast Agenda not only by producing a cleaner, greener city for residents, workers and visitors but also makes a significant contribution to the local economy and, in this regard, it is estimated that up to 680 jobs <sup>1</sup> are directly supported by the recycling of these materials. In addition, in terms of carbon dioxide and contributing to mitigating the Councils impact upon the climate, diverting this material from landfill is the annual equivalent of taking 16,500 cars (approx.) off the road.
3.11	Provisional figures suggest that the household recycling rate in 2018/19 will remain around 44%. Any uplift is likely to be due to a reduction in the amount of waste generated (down by 1,600 tonnes approx.) rather than an increase in recycling/composting, which has remained static <sup>2</sup> .
3.12	<p><b>Waste Framework – Actions</b></p> <p>The Waste Framework, approved by Council in June 2017, highlighted four themes to improve recycling, reducing landfill and ultimately delivering a more sustainable city. These are (i) Collection Systems (ii) Infrastructural Requirements (iii) Behavioural Change and (iv) Information Technology. The Framework outlines initiatives to improve not only the tonnage</p>

<sup>1</sup> Green Alliance report (2014) – “More jobs, less carbon”

<sup>2</sup> These figures will be validated by the NIEA, anticipated in Nov 2019 when the NIEA Annual Waste Statistics Report will be published.

	collected <b>but the quality</b> to supply local re-processing companies and contribute positively to the Circular Economy <sup>3</sup> .
3.13	<p>In 2017, an Options Appraisal of future kerbside collection arrangements was completed by WRAP/Resource Futures to consider factor affecting recycling (contribution to recycling rate, financial impact, legislative compliance, user acceptability) and a preferred approach, outlined in Figure 1 below was identified.</p> <p style="text-align: center;"><i>Figure 1 : Proposed Kerbside Collection Approach</i></p> <p style="text-align: center;"><b>Collections - Potential Approach</b></p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>Dry Recyclables (weekly)</p>  </div> <div style="text-align: center;"> <p>Food Waste (weekly)</p>  </div> <div style="text-align: center;"> <p>Garden waste (Fortnightly – seasonal)</p>  </div> <div style="text-align: center;"> <p>Non-recyclable waste ( 3 weekly or 180 bin)</p>  </div> </div>
3.14	<p>The Options Appraisal recommended collecting recyclables and food waste weekly in a wheelie-box. It is worth noting this <b>includes collecting glass</b>. In common with the materials collected, with the exception of cans and plastic pots, tubs &amp; trays, glass would be placed in a separate stillage container within the vehicle to preserve its quality (and market value). This system is complemented by a 180 litre bin for non-recyclable/residual waste.</p>
3.15	<p>In 2017, this proposed collection methodology was adopted by the Council as part of the Waste Framework and has been consulted on twice with the public through pre- and full-engagement exercises which used the Council's Citizen Space portal, supported by roadshows. To counteract bias, a statistically relevant, representative household survey was done in parallel with the full consultation.</p>
3.16	<p>The summary, findings showed broad support for the wheelie-box and a preference for a 180 litre black bin rather than a three weekly collections for residual waste.</p>

<sup>3</sup> The circular economy offers an alternative to the linear “take-make-waste” economy that is harming people and the environment. It seeks to extract maximum value from resources in use and keeps materials in circulation for as long as possible. The circular economy is strongly embedded in local economies and transition to this requires the innovative entrepreneurship and strong network connections that cities typically incubate - THE ROLE OF MUNICIPAL POLICY IN THE CIRCULAR ECONOMY.

	<b>Market Developments</b>
3.17	Waste and resources are an increasingly traded commodity on the international market with materials flowing across the world for treatment and disposal. In January 2018 however the Chinese Government's <i>Operation National Sword</i> introduced limits to reduce low-quality (i.e. contaminated) imported waste. These limits were brought into effect to protect China's environment and support Chinese jobs and the most relevant restrictions, affecting councils globally were (i) banning post-consumer plastics and mixed/unsorted paper (ii) setting a 0.5% tolerance level for sorted paper and (iii) restricting the number of import waste licences.
3.18	Historically, the UK has exported some paper and plastics to China. With changes in this market, alternatives were considered, but in the process, the income for low quality paper fell. At the time, the media highlighted that some councils' costs rose by up to £500k for their (lower grade) plastics and that, with several countries reaching capacity <sup>4</sup> , concerns increased that some materials were simply being dumped. <sup>5</sup>
3.19	In January, the party groups were presented with the proposed collection arrangements proposed within the Waste Framework and the results from the consultation exercises. Many of Belfast's materials are finding markets locally but the focus on improving recyclable quality is gaining importance rapidly. Top grade paper, collected at the kerbside, commands good prices from local re-processors such as Huhtamaki. Conversely, mixed materials from the co-mingled (blue bin) collections have fallen in value resulting in higher gate fees and a loss of demand from international markets.
3.20	Taking a strategic view, the Council needs to shift from simply delivering ever-increasing weight-based goals to producing high-quality recyclables to be used locally. This approach, which supports the Belfast Agenda, will mitigate the risk of market volatility, optimise income from recyclables and support local jobs. To add weight to this, a new Collaborative Network funded by Invest NI (there was an earlier iteration, called the Collaborative Circular Economy Network (CCEN) which produced a scoping study <sup>6</sup> ), is looking at how to increase the amount of materials used locally – the Council is part of this project. It is worth noting that external

<sup>4</sup> Exports of low quality materials increased to Malaysia, Indonesia, Taiwan, Turkey, &c. Some reached capacity quickly and ceased accepting these items, while others are now considering following China. This was picked up earlier this year when BBC broadcast "*War on Plastic with Hugh and Anita*" and highlighted several councils' waste being dumped in Malaysia

<sup>5</sup> Letsrecycle.com article "*LGA warns of risk to Councils from China ban 22/10/18*" see <https://www.letsrecycle.com/news/latest-news/lga-warns-risk-councils-china-ban/>

<sup>6</sup> The CCEN study identified that greater value could be got from household recyclables by meeting local re-processors' quality requirements. Based on local data, there was a potential £50M GVA which could be added to the NI economy.



	<p>organisations are also approaching the Council to explore opportunities to support this, or similar methodologies to maximise the recovery of quality materials and support local jobs. To show case this, approval was granted to the Committee in November 2018 recommending that Members undertake a study visit(s) to businesses and organisations in NI which are already contributing to the circular economy. After this report, these visits will now be progressed.</p>
3.21	<p>As also approved in November 2018, an application for DAERA funding was submitted which secured sufficient capital funding for the Council to introduce a pilot wheelie box scheme for around 5,500 households currently on the blue bin scheme, with a go live date next month. This pilot will act as a familiarisation exercise for the Council, as previously this type of collection system has been outsourced, but in order to secure this learning it is imperative that the scheme starts in September as any delay will prevent this progressing in 2019 and could compromise the funding.</p>
3.22	<p>The households within the pilot area will receive the following collections:</p> <ul style="list-style-type: none"> <li>• Weekly collection of dry recyclables by 165 x litre wheelie-box</li> <li>• Weekly collection of food waste by 23 x litre food waste caddy</li> <li>• Fortnightly collection of residual waste by 180 x litre black bin</li> <li>• Fortnightly collection of garden waste by 240 x litre brown bin</li> </ul>
3.23	<p>To drive recycling, the Service also intends to enforce the one bin policy introduced in January 2014 (collect only 1 x 180 litre black bin per household, except those households that have an approved second residual waste bin)<sup>7</sup>.</p>
3.24	<p>In the course of planning, it became clear that collection days for at least one stream of waste will need to change in the pilot area to avoid all containers being presented and all collection vehicles operating in the same area on the same day (bin blight).</p>
3.25	<p>In selecting the pilot area a number of criteria were assessed:</p> <ul style="list-style-type: none"> <li>• <i>Public acceptability of the scheme</i> – Responses to the consultation exercise were used to identify areas which were receptive to the new scheme;</li> </ul>

<sup>7</sup>

<https://minutes3.belfastcity.gov.uk/documents/s20755/15.1.14%20HES%20waste%20and%20recycling%20collection%20op%20policy.pdf>

	<ul style="list-style-type: none"> <li>• <i>Public attitude to recycling (in the form of current recycling performance)</i> – Performance data were used to identify areas achieving reasonable recycling performance but with room to improve;</li> <li>• <i>Operational feasibility/ impact</i> – Routes/ areas where the trial would be implemented with least operational impact; an area was selected where its impact on route optimisation was minimal;</li> <li>• <i>Cost</i> – Any pilot would be introduced with minimal cost implications. It is recognised that efficiencies could be achieved by selecting an area currently on the glass trial and diverting these resources to the pilot.</li> </ul>
3.26	<p>The pilot involves weekly household collections and a lower daily pass rate compared with the co-mingled scheme. Consequently, it will incur a net increase to operational costs. These costs are mitigated, however, as the proposed area is on the pilot purple box glass collection scheme with resources transferred from this activity to the wheelie-box scheme. In addition, income from the improved quality of the materials and increased landfill diversion will offset additional operating costs. It is expected therefore that the pilot will be net cost neutral.</p>
3.27	<p>As per funding in Section 3.21 and considering the risk, cost, public acceptability and industrial relations, Members are requested to approve the pilot being rolled out in the Castle DEA (North Belfast) with immediate effect (see <b>Appendix 2</b>).</p>
3.28	<p>To ensure that the wheelie box scheme is included within the programme of works, a submission has been made to the Council's Capital Works programme and is currently Stage 2 – Uncommitted. The next stage, an Outline Business Case (OBC) is being developed and will be informed by the DAERA-funded kerbside pilot. Subject to results, Members are asked to approve adopting this collection methodology and it is envisaged that to roll-out a scheme of this size city-wide will require a detailed, phased, implementation plan over 3-4 years.</p>
3.29	<p>It is noteworthy that neighbouring arc21 councils (Antrim &amp; Newtownabbey, Lisburn &amp; Castlereagh, and Mid-East Antrim) are also adopting this approach, which mirrors that promoted by both WRAP and the Welsh Government. Wales now has one of the highest performing recycling levels in the world (61% household recycling rate in 2017/18).</p>
3.30	<p>To further inform the kerbside collection scheme OBC, Members are recommended to approve extending the Council's Collaboration Agreement with WRAP which will ensure the</p>

	<p>Council can draw down expertise from this organisation regarding waste matters, and access additional networking and funding streams. Additionally, as per the November 2018 report, Members are recommended to undertake a study trip to Wales before considering the final OBC to see best practice and the kerbside scheme infrastructure in operation, most likely in Q4. It is envisaged that WRAP could assist with the arrangements surrounding this proposed visit.</p>
3.31	<p>As part of the English Waste Strategy published in December 2018, DEFRA has issued a consultation document “<i>Consistency in Household &amp; Business Recycling Collections in England</i>”. This consultation sought views of English householders on collections options and the need to shift towards better quality, specifically outlining the potential for multi-material (wheelie-box type) collection schemes. The consultation was interested in stakeholders’ views on additional performance indicators beyond weight-based targets (e.g. carbon intensity). While this consultation only applied in England, it will be important to reflect on the results which are likely to determine the direction of travel for the UK, as England makes up 85% of the national waste arisings. The results of this consultation are anticipated later this year and may generate further papers.</p> <p><b><i>Kerbside Glass</i></b></p>
3.32	<p>The possibility of the Council providing a kerbside glass collection is frequently raised by Members and residents. The wheelie-box pilot is aimed at demonstrating how this scheme would deliver both an enhanced collection service both for residents (in terms of collecting greater array of materials from the kerbside) and for the emergent local circular economy as represented by the Collaborative Network, covered in Section 3.20.</p>
3.33	<p>Currently, around 80K households (54%) in Belfast have access to a kerbside collection of glass. Bryson Recycling provides a kerbside sort (box) collection service for 58K households and a further 22K households receive a fortnightly collection through an in-house pilot purple box. The amount of glass captured through both schemes is 3,800 tonnes per annum (approx.) which contributes around 2.5% to the City’s recycling rate.</p>
3.34	<p>The “<i>WRAP Kerbside Waste Composition Report 2017</i>” noted that glass accounted for 9.4% by weight of the residual (black) bin (approx.). This is an easily identifiable material to recycle, and important in terms of the circular economy, it contributes less than the recycling of food (25%) and paper/card (18%)</p>
3.35	<p>The glass collected goes mainly to Encirc, a glass manufacturer in Fermanagh, where it is recycled and made into new glass containers, an example of recycling supporting local jobs.</p>

The market price for recycled glass is low but stable in comparison with other material streams. The following table (see Table 1) is indicative of the prices being achieved earlier this year. In summary, there is an estimated 6,100 tonnes of glass still in residual bins with a potential value of up to £122K, compared with an estimated 11,400 tonnes of paper with a potential value up to £1.4M.

*Table 1 Market Prices*

£/tonne	Jan	Feb	Mar	Apr
Mixed Glass	10-20	9-19	10-20	9-19
Paper (News)	90-100	90-100	80-90	77-85

Source: [letsrecycle.com](https://letsrecycle.com)

3.36 Given the volumes of recycling materials available and the increasing limitations in international trade, re-processors increasingly want quality materials. Kerbside sort schemes produce higher quality materials compared to co-mingled schemes. An examination of the Council's co-mingled (blue) bin scheme which excludes glass has a contamination of around 15% per annum (2017/18); by contrast, the inner city kerbside sort scheme records negligible contamination as wrong items are left in the container for residents to put in their residual waste (black) bin. A fully co-mingled scheme (which includes glass) can exacerbate this as shards of glass embed themselves in materials, such as paper, which considerably reduces the quality and value of this material.

3.37 The Resource Association, which represents re-processors and their supply chain, advocates high-quality recycling in order to maximise the contribution recyclables can make by feeding into the circular economy. Its members handle more than 7M tonnes every year, contributing over £3.3B to UK GDP and employ over 12,500 people. In its Manifesto for Resources, it proposes a ban on co-mingled collections which include glass:

*“Collection systems that mix glass with other materials are unable to separate glass efficiently without contaminating other material streams. Poor loading and unloading of vehicles, breakages of glass containers and aging Materials Recovery Facilities (MRFs) are unable to separate glass efficiently and consistently. Glass shards in the fibre stream (paper and card) cause real problems for paper manufacturers that are costly to resolve and reduce the value of materials that can be realised by local authorities.”*

3.38 As noted above in Section 3.20 above, building on the CCEN report the Council is a partner in an Invest NI funded Collaborative Network. The earlier study showed that improving

recyclable quality could add considerable value to the NI economy; in particular, on glass the report noted:

- There were strong drivers within Encirc (glass manufacturer) to increase/maximise the level of recycle glass used in the manufacturing process. Contamination levels however must be less than 1%;
- Local re-processors consider that co-mingled collected glass is too highly contaminated and this gets used for lower value applications and exported;
- If more local glass was available from separated collection systems, Encirc would use this to grow its business and increase the recycle within its products.

3.39 Closely associated with quality is the value derived from the recyclable materials. An examination of market prices (see Table 2), shows that the income from separate collections of mixed glass v MRF co-mingled glass favours the former by around £35 per tonne.

*Table 2 – Market Prices (Glass)*

£/tonne	Jan	Feb	Mar	Apr
Mixed Glass (separate collection)	10-20	9-19	10-20	9-19
MRF Glass	-25-5	-25-5	-25-5	-25-4

*Source: letsrecycle.com*

3.40 The revised Waste Framework Directive (2008 – rWFD) emphasises quality alongside tonnage as performance measures. In NI, the Waste Regulations (NI) 2011<sup>8</sup> highlight separate collection is expected for four materials (paper, metal, plastic, glass), unless it is technically, economically or environmentally impractical (TEEP) to do so. The Department for the Environment (DOE) sent a letter to councils outlining their legislative obligations surrounding separate collection obligations, particularly when councils were considering new collection arrangements. In this regard, the proposed wheelie-box collection scheme delivers this obligation and reduces the potential for legal challenge.

3.41 In light of the facts above, the Notice of Motion to commit the Council “*to increasing household recycling across the city of Belfast...(and)... to introducing glass recycling in households across the city of Belfast as soon as possible*” is to be welcomed. What is

<sup>8</sup> This legislation transposes the rWFD into Northern Ireland

increasingly apparent is the need to emphasis collection of quality materials, which the wheelie-box scheme as outlined in the Waste Framework delivers upon and approving this approach as outlined in Section 3.28 following consideration of the pilot will progress this and set an example of best practice for NI and the UK. In terms introducing these measures as soon as possible, given that transition from a blue bin to a wheelie box scheme will take time and resources, an OBC and programme of work has been developed which will require capital support. Based on a successful pilot, it is expected that a further submission will be made to the Department of Agriculture, Environment & Rural Affairs (DAERA) for support that could alleviate some of these costs. The schedule for these steps mean however that any roll-out is likely to take between 3-4 years as outlined in the Section above. In light of this information, Members are asked to note the actions being taken which support the November Notice of Motion.

### ***Behavioural Change***

3.42 This section of the Waste Framework concerned motivating residents to positively respond to deliver the paradigm shift needed to achieve 65% recycling rate for 2035. Members may care to note that in March 2017, the People & Communities Committee agreed that in line with the Food Waste (NI) Regulations 2015, a city-wide food waste service would be introduced using new food waste caddies and liners along with a supporting promotions campaign to remove this waste stream from the residual (black) bin. The campaign saw stickers put on all black bins and letters issued to all Belfast households; there was also a social media campaign. In 2017/18, this campaign and resident response boosted the Council's recycling rate by 4%. The uplift from the food waste campaign has plateaued however and, given that food waste makes up around 25% of the residual (black) bin, it is important to move to the Phase 2 of the Food Waste Campaign as approved in March 2017. This approach means direct engagement with residents who have yet to embrace the “*No Food Waste*” message.

3.43 The **engagement protocol** adopted in 2017 notifies householders of the contamination/food waste in the residual (black) bin, the steps required to resolve this and a graduated response where there is repeated contamination (a copy of the protocol is included with this report; see Appendix 3). The exact steps are that:

- (i) When contamination is first noticed (i.e. food waste identified in the bin), the crew would empty the black bin but a notification sticker on it informing the resident of the requirement to separate out food waste (**Stage 1**);

	<p>(ii) Next time, the bin would be emptied and again a sticker would be put on the black bin. A letter would be sent to the resident informing them of the need to put the food into the food waste container/bin and the ramifications should they choose not to do so (<b>Stage 2</b>);</p> <p>(iii) Finally, the bin would not be lifted and a sticker informing the resident would be put on the bin informing them that until the food item(s) are removed, the bin would not be lifted. When the resident removes the food item(s), collection will be on the next regular scheduled collection day (<b>Stage 3</b>).</p>
3.44	<p>To ensure that the Council does not inadvertently commence enforcement steps against residents, when contamination is recorded at Stage 1, the household will be visited to ensure that it has appropriate receptacles for food waste. The aim would be only to take action against residents who are actively choosing not to use their food waste bin properly. If a resident contacts the Council as a result of their bin not being emptied, staff would work with them to ensure future compliance with the policy.</p>
3.45	<p>Members may care to note that by diverting food from the residual (black) bin could save the Council a further £800K per annum. Therefore, diverting food could not only make a positive contribution to the Belfast's recycling rate and minimise its carbon footprint by reducing methane production in landfill sites, but it also could generate efficiency savings to be re-invested in other initiatives supporting the Belfast Agenda. Consequently, Members are requested to approve implementation of Phase 2 of the food waste campaign.</p>
3.46	<p>Finally, recent data concerning the Household Recycling Centres (HRCs) shows that the amount of residual waste received at these facilities has started to overtake recyclable materials. In 2018, WRAP examined Belfast's HRC performance and reported issues with (i) potential trade waste abuse (ii) users presenting residual black bags containing recyclable materials (iii) users coming from outside the City and (iv) the need for clearer communications.</p>
3.47	<p>Following the report, a WRAP led working group of officers from Councils was formed to address these issues. Arising from meetings, a Waste Acceptance Policy is being developed to tackle the unlawful disposal of commercial waste and ensure that residents continue to receive a valued and efficient service from the HRCs. The Service will bring a report outlining this approach to a future Committee meeting in due course.</p>

	<u>Financial &amp; Resource Implications</u>
3.48	The costs associated with this report are planned for within the revenue estimates for 2019/20 and extension of the WRAP Collaboration Agreement is £30,000 for 2019/20 (includes cost of proposed Members study visit).
	<u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.49	There are no equality, good relations or rural needs issues associated with this report.
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1 – Recycling rate performance  Appendix 2 – Wheelie-box scheme pilot area  Appendix 3 – Residual Waste Bin Monitoring & Encouragement Scheme – Managing Contamination in the General Waste Bin (Phase 2 – Food Waste)



## Appendix 1 – Recycling Performance

Figure 1 : Household Recycling Rate 2003/04 to 2017/18

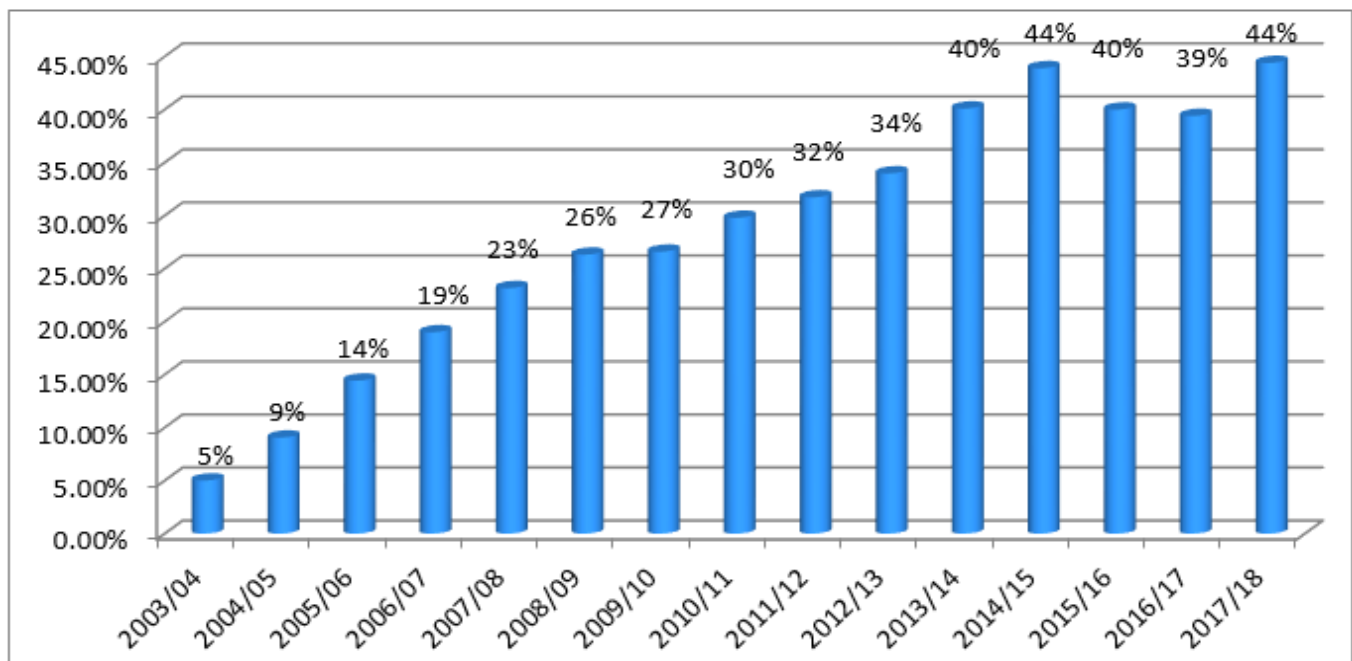
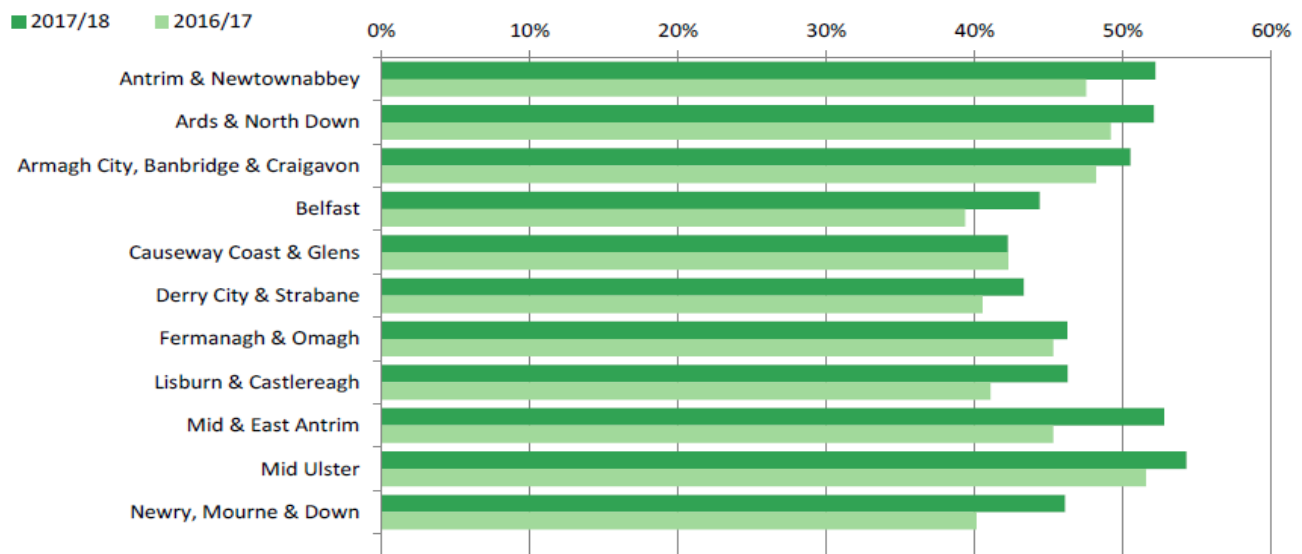
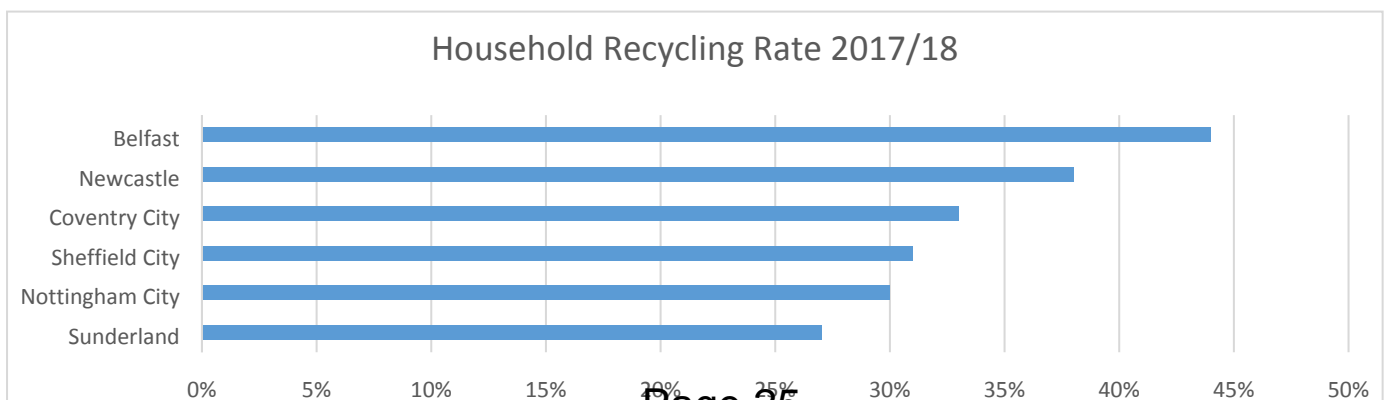


Figure 2: Household waste recycling rate

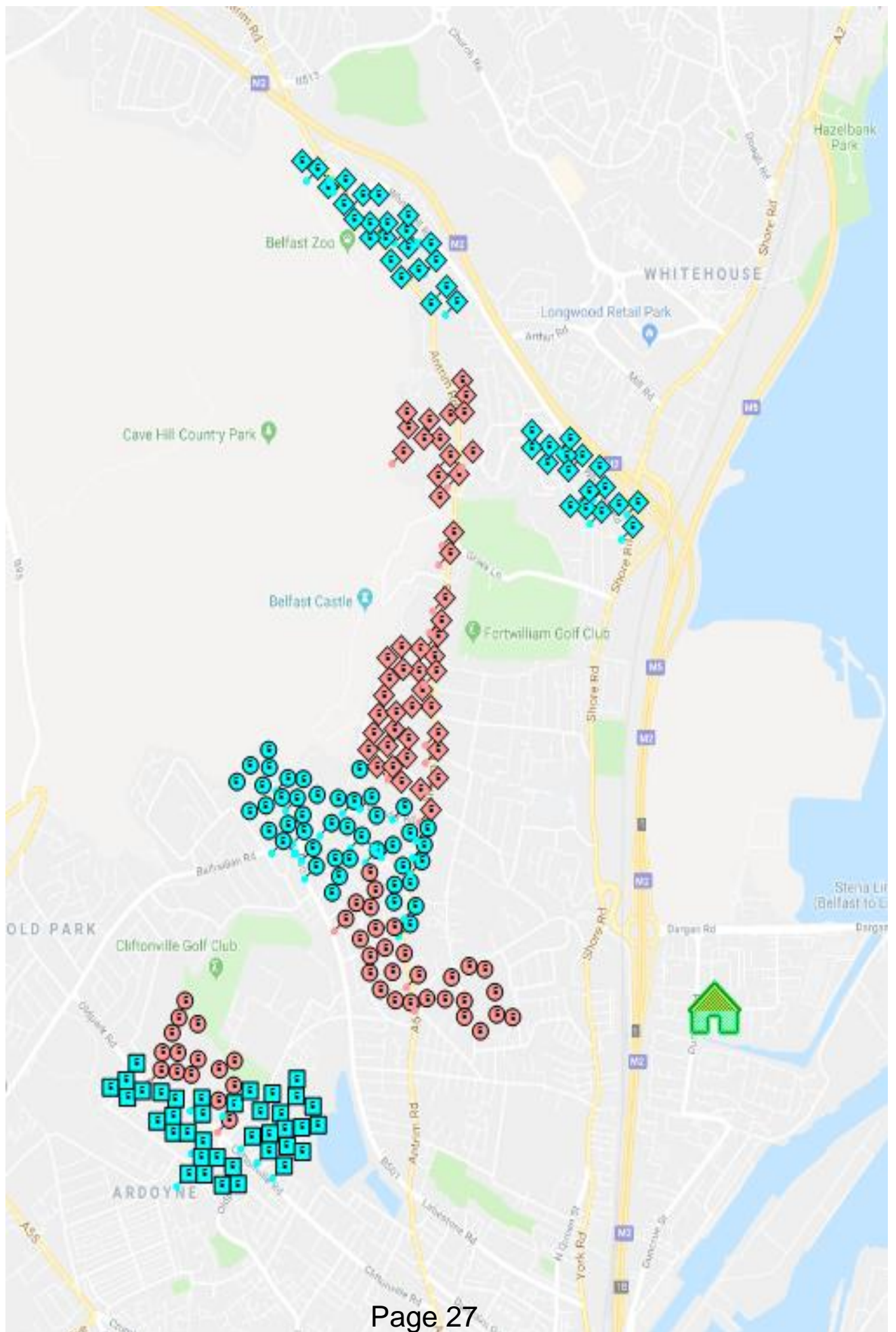


Source: NIEA – Northern Ireland Local Authority Collected Municipal Waste Management Statistics 2017/18

Figure 3 : Benchmark Household Recycling Rate 2017/18



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# **City & Neighbourhood Services Department**

## **Operational Guidelines**

### **Residual Waste Bin Monitoring & Encouragement Scheme Managing Contamination in the Residual Waste Bin**

January 2017



**Belfast**  
City Council

## **Residual Bin Monitoring Protocol**

### **Background**

Waste compositional studies show that around **25% of the weight of the residual bin is made up of food waste**. All households within the City have access to food waste collection schemes but despite this, the **Council spends an additional £800,000 per year** sending this material to landfill rather than it being composted and counting towards the recycling rate.

**If even half of this material was put in the food waste bin, the city's recycling rate would jump by 6%!**

This protocol is aimed at outlining how the Council will tackle this issue in a practical fashion but with fairness and transparency.

**Desired Outcome** – Environmentally friendly city with improved efficiencies

**Outputs** – Reduced tonnage of food to landfill and increased tonnage to composting operations

**Performance Indicators** – Recycling rate and NILAS target

### **Contamination Policy**

One of the primary outcomes of the *Belfast Agenda – Your Future City* is a vibrant, attractive, connected and environmentally friendly city.

To meet this aim the Council is engaged in developing a Circular Economy approach, where the make, use, dispose attitude is replaced by one which sees value in waste materials and seeks to ensure that these resources remain in the value chain for as long as possible.

To assist in the creation of this cleaner, greener future it is important that quality materials are provided to end users to make new products. In addition, it is incumbent upon the Council to strive towards the 50% recycling target for 2020 and in doing so support and create jobs in the local economy. This policy will contribute to these goals.

The policy is seeking to reduce contamination levels and maximize recycling and composting rates through the application of a graduated enforcement protocol. Householders will be supported in complying with the policy through the availability of a comprehensive range of communication materials detailing what items should be placed in which bin.

The policy will be applied to all households excluding exceptional circumstances where there are genuine reasons as to why the policy cannot be complied with.

The Council reserves the right to consider individual cases of non-compliance on the basis of their individual merit. This may include needs such as medical, special assistance or other conditions.

These will be evaluated on an individual case by case basis by the Waste Management Service and appropriate mitigation measures put in place.

### **Key Elements of Monitoring & Enforcement Protocol**

1. Internal training
2. Communications
3. Monitoring
4. Enforcement

#### **1. Internal training**

This will be achieved by:

- Introductory training
- Information leaflets
- Intranet
- Refresher training

#### **2. Communications**

The Council produces a number of leaflets on the different kerbside collection schemes which clearly identify the acceptable materials in each scheme. These leaflets will be updated, as required, to reflect the acceptance criteria of the various materials.

In Spring 2017, the Council will launch a food waste campaign aimed at capturing the food waste from the residual bin. This will involve a bin sticker placed on all residual bins along with an explanatory letter highlighting the rationale for the exercise and requesting that residents take part in the scheme. This will be supported by multiple communications tools (online and traditional).

Through the usual communications channels, the Council will continue to regularly remind residents of their civic duty and explain why it is important that they put the right stuff in the right bin.

In 2017, the Council will launch the Binovation app which provides a mobile information platform on the Council's various recycling initiatives and in particular the key materials which can be accepted in the kerbside schemes. This will include information on the residual waste bin.

#### **3. Monitoring**

Any food waste presented in the residual waste bin will be deemed as 'contamination'.

- Council staff will monitor the residual bins by visual inspection of the contents.
- Staff should never put their hands inside the bin.

#### **4. Enforcement**

- a) From the policy's introduction (April 2017), there will be a 6 month transition period in order for those households that do not have the necessary caddies &c. to participate correctly, to acquire these items.
- b) Council staff will conduct visual inspections of bin contents for obvious signs of food waste materials.
- c) On the first occasion, should food waste be found in a residual waste bin, the bin will be emptied but a yellow warning sticker will be placed on the lid of the bin to inform the householder of the prohibition of food waste in black bins. The sticker will contain all the information for the household to help participate in the scheme fully. A note of the household number will be taken.
- d) Should a household be found to have contaminated their bin for a second time, the bin will be emptied and a similar sticker will be placed on the bin. A letter will be sent to the householder outlining the issues and explaining that any further contamination may result in disruption to their residual bin collection service.
- e) In the event of a householder contaminating the residual waste bin with food waste for the third time the bin will have a red notification sticker placed on it and the collection crews will not empty the bin. The notification sticker will clearly state that in order for the bin to be emptied the householder will be required to remove the unsuitable materials and present the bin for collection on the next scheduled collection day.

At each stage the Council will ensure that each household receives the necessary information and supporting materials to ensure that they can participate fully in the food waste collection service.

#### **Notes**

In cases where a bin has been left contaminated for a long period of time the crew should inform Cleansing Business Support who will inform the Resource Advisor Supervisor to assess whether the bin should be removed.

If there is no readily identifiable address then the location of the bin will be recorded on an Excel spreadsheet.

In cases of apartments that have contaminated bins, the Waste Officer (Special Projects) should be informed.





<b>Subject:</b>	External Consultations on Packaging and Packaging Waste
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services Siobhan Toland, Director of City Services
<b>Contact Officer:</b>	Tim Walker, City Services Manager, Fleet & Resources

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	As agreed at the April 2019 People and Communities Committee, this update is to provide Committee with a copy of the relevant responses from the Council and arc21 to recent consultations relating to Packaging and Packaging Waste.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked:</p> <ul style="list-style-type: none"> <li>To retrospectively adopt the consultation responses to the Reforming the UK Packaging Producer Responsibility Scheme, Introducing a Deposit Return Scheme in England, Wales &amp; NI and Plastic Packaging Tax as submitted by the Council and arc21 earlier this summer.</li> </ul>

3.0	<b>Main report</b>
3.1	Members may be aware of a recent series of consultations from the Department for Environment, Food and Rural Affairs (DEFRA) relating to packaging and packaging waste. These are likely to have a considerable impact upon the waste and resources sector in the UK in general and serve to provide further justification for the Council in its approach to target improving the collection of quality materials from householders.
3.2	<p>The three consultations are as follows:</p> <ol style="list-style-type: none"> <li>1. Reforming the UK Packaging Producer Responsibility Scheme (PPRS);</li> <li>2. Introducing a Deposit Return Scheme in England, Wales &amp; NI (DRS); and</li> <li>3. Plastic Packaging Tax (PPT).</li> </ol>
3.3	Members may care to note that DEFRA also produced a fourth consultation entitled “ <i>Consistency in Household and Business Collections in England</i> ” which is not applicable to Northern Ireland.
	<u>Key Issues</u>
3.4	Considerable change in public attitudes to the natural environment and our impact upon it is underway, highlighted by TV programmes such as “ <i>Blue Planet</i> ” and “ <i>The War on Plastic with Hugh and Anita</i> ” which expose the pollution caused poor waste and resource management. Against this background, there is increasing recognition that waste and resources management provides a considerable opportunity to address production and consumption and manage materials better. Increasingly, this is being labelled as the circular economy which, as a concept, seeks to rebuild economic and natural capital. As an approach, it is worth emphasising that the circular economy is not just about recycling more stuff – dealing with materials and products once they become waste – but is about a complete recasting of how materials and resources are treated throughout their production and post-production life – managing the supply chain.
3.5	In May 2018, the EU approved a package of legislation setting binding targets on waste and recycling to move to a more Circular Economy. There are several headline targets under the new Directive which will require Member States to recycle 65% of their municipal refuse by 2035, to separately collect hazardous waste by January 2025, to halve food waste by 2030. The EU also proposed phasing out landfilling, and promoting economic instruments “ <i>such as extended producer responsibility schemes</i> ” (EPR).

3.6	<p>A separate directive was also approved on Packaging Waste to ensure that 70% of packaging is recycled by 2030 (this is different for individual packaging materials, for example 30% for wood, 55% for plastic, 75% for glass and 85% for paper). Member States had two years to incorporate the Circular Economy Package into national legislation, followed by another two to three years to implement changes.</p> <p>When published, the UK Government committed to backing the packages.</p>
3.7	<p>In the UK, in 2017 the Department for Business, Energy &amp; Industrial Strategy (BEIS) produced the Clean Growth Strategy and highlighted that (a long overdue) Waste &amp; Resources Strategy for England was due imminently which, combined with the</p>
3.8	<p>Government's Industrial Strategy would have <i>“strong commitments on resources productivity as a critical contribution to a successful economy”</i>.</p>
3.9	<p>In December 2018, DEFRA published the Waste &amp; Resources Strategy which included commitments on revising the extended producer responsibility (EPR) schemes for a variety of materials (packaging included) and the introduction of a deposit return scheme. On initial review, the proposals around packaging could see retailers and producers expected to pay considerably greater sums under EPR (as much as £1Bn) and, in order to inform the finalisation of this approach, DEFRA undertook a series of comprehensive consultation exercises. The responses from these consultations will be used to inform Government thinking and are likely to generate further consultations later this year or later in 2020.</p>
3.10	<p>Responses to the three consultation papers relevant to Northern Ireland have been developed by arc21 (see Appendix 1) and a further review has been undertaken by Council officers to the consultations to add a city perspective to these (see Appendices 2 &amp; 3). They are the subject of this Committee paper and a summary of each is provided below:</p>
3.11	<p><b><u>Reforming the UK Packaging Producer Responsibility Scheme (PPRS)</u></b></p> <p>Recognising that the EU impact of packaging is locked in at the design stage, this consultation seeks views on measures to reduce the amount of unnecessary and difficult to recycle packaging and increase the amount of packaging that can and is recycled, through reforms to the packaging producer responsibility regulations.</p> <p>It also proposes that the full net costs of managing packaging waste are placed on those retailers, producers and others within the supply chain who use packaging and who are best placed to influence its design. This is consistent with the polluter pays principle, EPR and promoting a shift towards the Circular Economy.</p>

3.12	<p>In the UK, a system of producer responsibility for packaging has been in place since 1997. Starting 20 years ago, this has helped to drive recycling of packaging waste from 25% to 64.7% in 2016. Over this period, the UK has met all of its national and EU packaging waste recycling targets, and the cost of compliance to business has been kept low when compared to other EU Member States.</p>
3.13	<p>Like any system that is over 20 years old however it is in need of reform. Stakeholders have expressed concerns over the transparency of the system including how income from the sale of evidence has supported packaging waste recycling; that councils receive limited direct financial support for managing packaging waste; and that there is not a level playing field for domestic reprocessing.</p>
3.14	<p>Government's ambitions have increased too and in recent months there has also been a rise in public consciousness when it comes to the need to tackle packaging waste. DEFRA has indicated the need to: reduce substantially unnecessary and difficult to recycle packaging; make more packaging designed to be recyclable; have more packaging waste be recycled; and to have more packaging to be made from recycled material.</p>
3.15	<p>DEFRA also wants fewer packaging items to be littered and for it to be easier for people and businesses to recycle their packaging waste. Reforming the packaging waste system addresses these ambitions and the commitments made by all UK devolved administrations.</p>
3.16	<p>For Belfast, the response submitted proposed placing greater responsibility onto those within the packaging chain and, should this approach be adopted, under current proposals the Council would receive additional financial support of around £4M per annum to assist in paying for the collection and recycling of packaging, as well as contribute towards some of the costs associated with littering.</p>
3.17	<p><b><u>Introducing a Deposit Return Scheme in England, Wales &amp; NI (DRS)</u></b></p> <p>While waste policy is a devolved responsibility, and the Scottish, Welsh and Northern Ireland administrations can decide policy separately, DEFRA wants to ensure that, as far as possible, their approach to DRS forms part of a coherent UK-wide system. The Government and devolved administrations are therefore working closely together on this policy area. This consultation was undertaken jointly by the UK and Welsh Governments and the Department of Agriculture, Environment &amp; Rural Affairs in NI (DAERA).</p> <p>As the Assembly is not sitting, the UK Government, in discussion with DAERA, consulted on their behalf. DAERA officials have informed DEFRA that they have no evidence that NI stakeholders or Ministers would not wish to participate in a consultation on options for a DRS.</p>

3.18	<p>The consultation sets out details on how a DRS could be managed, financed and operated. and proposes that the materials to be included in a DRS are PET and HDPE plastic bottles, steel and aluminium cans, and glass bottles. It includes a broad range of drinks, including water, soft drinks, juices, alcohol, and milk-containing drinks, when sold in containers made of these materials.</p>
3.19	<p>The consultation sets out two options for a DRS, both of which cover the same materials and drinks outlined above, but differ in terms of the size of the drinks containers in-scope. The options are:</p> <ul style="list-style-type: none"> <li>• the “<i>all-in</i>” model, which would not place any restrictions on the size of drinks containers in-scope of a DRS; and</li> <li>• the “<i>on-the-go</i>” model, which would restrict the drinks containers in-scope to those less than 750ml in size and sold in single format containers. This model would target drinks beverages most often sold for consumption outside of the home (while “<i>on-the-go</i>”).</li> </ul>
3.20	<p>Responses to this consultation will help DEFRA consider the merits of introducing a DRS. The aim of the UK and Welsh Government and DAERA is to ensure that, should a DRS be introduced, it will be easy for consumers to return drinks containers, leading to increased recycling rates and a reduction in littering. Following the passage of DRS-related legislation, there will be a short period of further formal consultation on specific regulatory measures in early 2020.</p>
3.21	<p>For Belfast, as highlighted by arc21, the position of NI is different from GB in that there are different considerations (e.g. market conditions, base costs, land border with the RoI, council functions &amp;c.) The key consideration however concerns the timing; introducing a DRS in advance of, or in tandem with Packaging Responsibility Reform is likely to cause great confusion and complexity in the market. From an operational impact perspective, a DRS should only be considered following the introduction of the Packaging Responsibility Reform to compensate for any apparent shortfalls within the EPR scheme.</p> <p><b><u>Plastic Packaging Tax (PPT)</u></b></p> <p>At Budget 2018, government announced that from April 2022 it would introduce a world-leading new tax on the production and import of plastic packaging with less than 30%</p>

3.22	<p>recycled content, subject to consultation. Plastic packaging accounts for 44% of plastic used in the UK, but 67% of plastic waste, and over 2 million tonnes of plastic packaging is used each year. The majority of this is made from new, rather than recycled plastic.</p>
3.23	<p>The Government's call for evidence last year, which received a record 162,000 responses, highlighted that recycled plastic using is often more expensive than using new plastic, despite its lower environmental impacts. The Government wants to shift the economic incentives involved in the production of more sustainable plastic packaging, encouraging greater use of recycled plastic and helping to reduce plastic waste. This complements the government's proposals for reformed Packaging Producer Responsibility regulations.</p>
3.24	<p>The consultation outlines the Treasurer's proposal for how the tax will work and contains a number of questions relating to this. For example, which packaging should be in scope of the tax, how to assess recycled content, and which businesses will be liable for the tax? Government is seeking views on the best design options.</p>
3.25	<p>Ultimately, this proposed tax will act as the "<i>pull mechanism</i>" with the Reform of the Packaging Producer Responsibility being the "<i>push</i>" to change how plastic packaging is managed. If the proposed measures are introduced it will be important to ensure the balance between the "<i>pull</i>" and "<i>push</i>" mechanisms are appropriate and can be rebalanced if required. If Government proceeds with this tax, the Council would clearly support arc21 recommendations that the funds received are used in a manner consistent with the measures of the Packaging Producer Responsibility Reform in each of the devolved administrations, particularly regarding supporting councils' endeavours.</p>
3.26	<p>In concluding this report, Members may care to note that DEFRA have stated that the responses to these consultations will help inform a new proposals and a further series of consultation exercises. These will be run alongside additional consultations on introducing the Circular Economy into the UK (and NI) and will also call for a review of supplementary legislation, policies and plans. It is anticipated that this batch of consultations will get underway later this year or early in 2020.</p>
	<p><u>Financial &amp; Resource Implications</u></p> <p>While there may be considerable financial implications from introducing these consultations, there are no financial or resource implications associated in responding to them.</p>

3.27	<u>Equality or Good Relations / Rural Needs Assessment Implications</u> There are no Equality, Good Relations or Rural Needs Implications in responding to the consultations
3.28	
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1 - Arc21 responses to the consultations Appendix 2 - Council response to the PPRS consultation Appendix 3 - Council response to the DRS consultation

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## **Consultation on Reforming the UK Packaging Producer Responsibility System**

### **Introduction**

arc21 is a Local Government sector entity embracing six Councils located along the Eastern Region of Northern Ireland which covers approximately 33% of the land base, populated by approximately 59% of the national population and accounts for approximately 60% of the national Local Government controlled municipal waste arisings.

The establishment of arc21 together with its functionality has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.

In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.

The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council

### **Report**

arc21 welcomes the opportunity to respond to this consultation and prior to answering the specific questions contained in the consultation document we would offer the following comments.

In general and as a matter of principle arc21 have consistently advocated a reform of the Packaging Producer Responsibility Scheme and accordingly would comment the government for setting out proposals in this regard.

The Government have taken a conscious decision to launch this consultation in conjunction with three other consultations of which two are applicable to Northern Ireland i.e. Consultation on Plastic Packaging Tax and Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland. The third consultation on Consistency in Household and Business recycling collections in England is not applicable to Northern Ireland. arc21 understand this was a conscious decision in view of the strategic linkage between the consultations. This was reinforced at various events attended during the consultation period including the multi sector event held in Belfast on 12 March 2019.

In view of the applicability of the collection consistency consultation, it would not be appropriate for arc21 to respond to the aforementioned consultation document. Nevertheless there is a clear linkage to its contents and arc21 would wish to point out the position in Northern Ireland is different in a number of aspects e.g. market conditions, base costs, land border with the Republic of Ireland, council functions etc.

arc21 welcomes the scope in the consultation document for refinement of detail with the strategic framework to reflect Northern Ireland specific circumstances. This is particularly relevant, but not exclusively, to service standards and collection related payments. We would strongly advocate direct and material engagement with Northern Ireland Council representatives on the future development of proposals

Finally, given devolved administration's role and responsibility in this matter it would be helpful if any subsequent economic assessment contains costs pertinent to each devolved administration area.

## **Questions**

**1. What is your name?**

*arc21*

**2. What is your email address?**

*info@arc21.gov.uk*

**3. Please provide information about the organisation/business you represent.**

*arc21 is a Local Government sector entity embracing six Councils located along the Eastern Region of Northern Ireland which covers approximately 33% of the land base, populated by approximately 59% of the national population and accounts for approximately 60% of the national Local Government controlled municipal waste arisings.*

*The establishment of arc21 together with its functionality has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.*

*The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council*

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

*In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.*

**5. Would you like your response to be confidential?**

*No.*

**6. Do you agree with the principles proposed for packaging EPR?**

*Yes.*

*Although implementing the changes requires us to have confidence in the long term commitment for increased financial support to councils. We recognise that the details of the changes and therefore the details of any specific commitments (including distribution of any funding between authorities) would be decided following future consultations if the policies proceed as currently indicated but it is essential that this information is provided as soon as practicable. We are also concerned to ensure that the particular challenges of increasing recycling in dense urban environments is properly calculated and fully recognised in both payment calculations and standards.*

**Please briefly state the reasons for your response.**

- *Because businesses will bear the full costs of managing the packaging they handle or place on the market under the proposed new scheme. The principle of an extended producer responsibility (EPR) regime is that producers are responsible for the impact of the products that they place on the market from 'cradle to grave'. Whilst the current packaging EPR makes everyone in the packaging chain, above a de minimis, responsible, it does not make producers responsible for the full costs of managing packaging waste, which undermines the principle of EPR. The consultation document notes that "At most around 10% of costs are covered<sup>1</sup>; but our analysis indicates that less than 7% of the costs of managing household packaging waste are covered by producers." Therefore, in particular we support principle 3 – that businesses will bear the full costs of managing the packaging they handle or place on the market.*
- *Because the proposed packaging EPR will better implement the waste hierarchy and more clearly support the principles of the circular economy than the present scheme. The reformed EPR will not incentivise reuse specifically. However, the second proposed principle of the new scheme is that businesses will be incentivised to reduce unnecessary and difficult-to-recycle packaging and to design and use packaging that is recyclable. As a result, the proposed new scheme should more clearly support the waste hierarchy and the principles of the circular economy than the present arrangement.*

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<sup>1</sup> House of Commons Environmental Audit Committee Report, December 2017  
<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/339/339.pdf>

- *Because it will provide for improved consumer information on packaging which should result in reduced contamination and more effective recycling.* For any EPR scheme to work effectively the product users must understand their role and act accordingly. At present, the consumer information obligations for packaging waste are unclear, which coupled with weak enforcement, has led to uncoordinated implementation of the consumer information obligations for packaging waste. This has resulted in different obligated businesses within the current scheme providing different information about how consumers should recycle the packaging on the products that they buy. As a result consumers are often confused about what to do when they come to dispose of a product and its packaging which leads to less effective recycling and higher levels of recycling contamination than we want.

**6. Do you agree with the outcomes that a packaging EPR should contribute to?**

*Yes.*

- *The accompanying Impact Assessment to this consultation states that the money raised through the system should fund better recycling collections, domestic recycling infrastructure and services under clear conditions that deliver overall system savings. The consultation document does not mention the aim to deliver overall system savings and in fact states that there is sufficient high quality reprocessing capacity in the UK to handle the increasing quantities of packaging waste for recycling.*

**7. Do you think these types of items not currently legally considered as packaging should be in scope of the new packaging EPR system?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *Out of the list of possible additional items (foil, cling film, jiffy bags, paper cups and [rolls of] sandwich bags not currently legally considered as packaging the only one we consider should be included in the new EPR is jiffy bags. We expect, although have no data to verify this, that jiffy bags are used as much by producers and packer fillers as well as in the home e.g. for online sales of products, so for this reason would like to see them included in the EPR. They are also difficult to recycle.*
- *We would like to see paper cups considered for some type of EPR in due course, but a separate scheme for single-use cups of any type is likely to be more relevant (rather than just focussing on paper ones).*

**9. Which of these two classifications best fits with how your business categorises packaging?**

- (a) Primary, secondary, tertiary**
- (b) Consumer-facing and distribution/transit**
- (c) Neither – please say why, and provide a description of how your business categorises packaging**

*Not applicable.*

**10. Do you agree with our definition of full net cost recovery?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- Whilst arc21 generally supports the definition of full net cost recovery, we feel that there are some gaps which need to be covered. It is important that the coverage of costs properly addresses all the areas associated with the sustainable management of packaging. This needs to include the costs of making household waste and recycling centres available to the public for receiving packaging waste as well the costs of clean-up of littered and fly-tipped packaging. It also needs include the costs of collecting packaging that is within the residual waste stream as well as the packaging within the dry recycling stream. To work out the quantities of packaging materials within the residual stream, composition analyses (or other forms of analysis) will be required, and the costs of these will also need to be covered. We do welcome the inclusion of the costs of providing information to consumers on recycling packaging waste and anti-littering.*
- arc21 is unclear how income from the sale of recyclable packaging will be netted off. We are concerned that if the income netted off is an average annualised amount per tonne for example, that it may be insufficient incentive for materials recycling facilities (MRFs) to get the best possible price for the sale of the packaging material for recycling. The way the system is structured will need to ensure that the commercial/market incentives for the trading of recyclate are maintained.*
- The consultation document notes that there is an expectation that recycling costs per tonne of packaging will decrease over time. There is no detail in the consultation document or impact assessment about how this has been modelled. It will be important for all parties to understand better how the costs have been and will continue to be calculated in order to understand how 'full cost' recovery has been determined.*

**11. Do you agree that producers should be required to fund the costs of collecting and managing household and household-like packaging waste, i.e. all consumer facing packaging?**

*Yes.*

12. Do you agree that packaging for commercial/industrial applications should be out of scope for full net cost recovery?

*Yes.*

13. We would welcome your views on whether or not producers subject to any DRS should also be obligated under a packaging EPR system for the same packaging items.

*Yes they should.*

**Please briefly state the reasons for your response.**

*Whilst arc21 believes that a DRS is likely to reduce the quantity of drinks containers within residual waste, it will not eliminate it. Therefore there will still be costs associated with collecting and managing the drinks containers within the residual waste stream, so EPR is needed to ensure that these costs are covered and encourage producers to do everything in their power to make sure that drinks containers are captured.*

14. Do you agree with the development of an ‘approved list’ of recyclable packaging to underpin the setting of either modulated fee rates or deposits?

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- Clarity of labelling for consumers can only be brought about if there is an approved list of what can and cannot be recycled, and recycling will be more effective if the labelling is clear. Please see our response to question 6 for evidence of the importance of clear labelling. However, the practicalities are that different MRFs accept different ranges of materials so it will be important to find a way in which the national variability of what can and cannot be recycled is incorporated during any transitional period.*

15. Do you think the payment of modulated fees or the payment of deposits with the prospect of losing some or all of the deposit would be more effective in changing producers’ choices towards the use of easy to recycle packaging?

*(a) Modulated fee*

**Please briefly state the reasons for your response and provide any information to support your view.**

*Modulated fee:*

- We support a modulated, placed on the market (POM), fee for producers - whereby they pay fees based upon the quantity and types/formats of packaging they handle - as the best approach for changing producers’ choices towards the use of easy-to-recycle packaging.*

*A modulated fee would send a clear signal to producers and designers to consider end-of-life at the design stage. Fees could be flexible allowing for the fees to be adapted as new packaging types come onto the market such as compostable, or biodegradable packaging or packaging with electronic sensors for example in-built, and could be set to take account of composite materials.*

*Deposit and fee:*

- This approach is similar to how the energy market operated for a period of time with companies paying upfront based upon an estimate of their annual energy use and then a repayment at the year-end based upon their ranking in the market. It may be useful to look at why this system was changed.*
- In our view a deposit (for recyclable packaging) and fee (for non-recyclable packaging) is likely to be too difficult to operate and potentially make it more difficult for businesses to budget for their annual costs of compliance.*
- Although the deposit and fee approach would potentially be more responsive to market pricing – with deposits returned based upon the real cost of recycling, the risk with this approach is that producers could contribute more than the full net cost overall of packaging placed on the market – which the consultation document recognises.*
- Although the deposit and fee is attractive, because it is more likely than a modulated fee to stimulate a circular economy approach; on balance we support the modulated fee.*

**16. Do you think there could be any unintended consequences in terms of packaging design and use arising from:**

**(a) Modulated fees**

**(b) Deposit (for recyclable packaging) and fee (for non-recyclable packaging)**  
**Please briefly state the reasons for your response and provide any information to support your view.**

- Both modulated fees and a deposit/fee approach are expected to encourage producers to substitute less easily recycled material for more easily recycled material in their product packaging. However, the provision of materials and recycling facilities varies across the country. So, one unintended consequence as the result of the substitution of one material for another could be that the average transport distances could increase for both transporting materials for packaging manufacture and at the end of life to packaging recycling facilities.*

**17. Do you agree that the deposit approach should be designed to incentivise more closed loop recycling?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *A fiscal signal to include easily recyclable material, whether that be a deposit/fee or modulated fee, raises awareness of the need to design in recyclability from the outset and the deposit approach also provides the opportunity to incentivise closed loop recycling.*

**18. What do you consider to be the most appropriate approach to a single point of compliance, the Brand-owner or the Seller approach?**

**(a) Brand-owner**

*Yes.*

**(b) Seller**

**(c) Other**

**(d) I don't support moving to a single point of compliance**

**Please briefly state the reasons for your response and provide any information to support your view.**

- *The current system of shared responsibility across the packaging chain has worked well since its introduction, but we note that this creates the potential for four separate organisations to be obligated for one unit of packaging – the material manufacturer, the converter, packer-filler and seller. We also recognise the risk of the price signal being diluted by having a shared responsibility approach. As a result, we support reform to a single point of compliance.*
- *We support compliance at the brand-owner level on the basis that the brand owners are the ones putting the product forward to the market but have no further evidence to support this view. Brand owners and sellers are best placed to answer this question.*

**19. If a single point of compliance approach was adopted, do you think the de-minimis should be:**

**(a) Replaced with a lower turnover threshold?**

*Yes.*

**(b) Retained and wholesalers and direct-to-retail sellers take on the obligation of those below the threshold?**

**(c) Other, please state**

**(d) Don't know**



**Please briefly state the reasons for your response and provide any information to support your view.**

- *Replacing the de-minimis with a lower turnover threshold still retains the principle of producers being obligated under producer responsibility legislation, albeit that very small and micro-businesses would be exempt such as an independent café that fills takeaway boxes at the point of purchase.*
- *A move to retain the de-minimis threshold and obligate wholesalers and direct-to-retail sellers of unfilled packaging seems to undermine the principle of producer responsibility – because the wholesalers and direct-to-retail sellers would have to pay the fees on the unfilled packaging products that they sell to producers (albeit that the prices they would charge would be inclusive of EPR obligations).*
- *Whilst we note the littering impact of packaging placed on the market by takeaway businesses our view is that it is better to introduce the new system first as proposed with a lower threshold and then review it at a later date if it becomes clear that the exemption of very small businesses is causing a problem.*

**20. Should small cafés and restaurants selling takeaway food and drinks whose packaging is disposed ‘on the go’ be exempt from being obligated?**

*No.*

**Please briefly state the reasons for your response and provide any information to support your view.**

*Small cafés, restaurants, fish and chip shops and other takeaway outlets produce packaging waste which is commonly littered. Whilst drinks containers are likely to be covered by a DRS, other items e.g. food takeaway boxes, will not be. Making these businesses obligated under EPR would encourage them to produce less, and/or more reusable, packaging.*

**21. If shared responsibility is retained, is Option A or Option B preferable for including smaller businesses or the packaging they handle in the system?**

- (a) **Option A (Lower or remove the de-minimis)**
- (b) **Option B (De-minimis threshold remains as is and obligations extended to distributors of packaging or packaged products)**
- (c) **Other, please state**
- (d) **I don’t know**

**Please briefly state the reasons for your response and provide any information to support your view.**

*We do not think shared responsibility should be retained so have not answered this question.*

**22. If you have stated a preference for A, do you think the de-minimis threshold should:**

- (a) Be reduced (please state your suggested threshold)**
- (b) Be removed entirely**

**Please briefly state the reasons for your response and provide any information to support your view.**

*We have no meaningful information that would enable us to provide a response.*

**23. Overall, do you have a preference for maintaining a shared responsibility compliance approach, or moving to a single point of compliance?**

- (a) Single point of compliance.**

**Please briefly state the reasons for your response and provide any information to support your view.**

*Please see our response to Q.18.*

**24. Do you have a preference for how small businesses could comply?**

- (a) Pay a flat fee to include a contribution to a communications fund**
- (b) Apply an allocation formula**
- (c) Other, please describe**

**Please briefly state the reasons for your response and provide any information to support your view.**

*We have no meaningful information that would enable us to provide a response.*

**25. Do you think that requiring operators of online marketplaces to take the legal responsibility for the packaging on products for which they facilitate the import would be effective in capturing more of the packaging that is brought into the UK through e- commerce sales?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- Operators of online marketplaces should, as a matter of principle be sharing some of the producer responsibility burden associated with the packaging for which they facilitate the import and then pass into UK consumers' homes and waste.*
- These are digital businesses so the ease of compliance should be high and the costs of ensuring accurate reporting relatively low. However, incorporating these businesses into the EPR framework is inevitably likely to result in some self-reporting.*

- *Given that more and more people now buy on-line it seem perverse to exempt these businesses from the overall regime.*

**26. Do you agree payments to councils for collecting and managing household packaging waste should be based on:**

- (a) provision of collection services that meet any minimum standard requirements (by nation);**
- (b) quantity and quality of target packaging materials collected for recycling;**
- (c) cost of managing household packaging waste in residual waste**

**Please briefly state the reasons for your response and provide any information to support your view.**

- *Yes, we agree that the payments to councils for collecting and managing household packaging waste should be based on all of the above measures.*
- *A long-standing complaint of producers and retailers has been the varying collection systems provided by councils across the country and that as a result communication about recycling on a national scale is more difficult. Collection services which meet minimum standard requirements set by each nation would help to address this and ensure that the efficacy of communications is maximised.*
- *We note that the consultation states that if additional packaging items, such as film plastic waste produced by households (which is mostly LDPE) and compostable plastic packaging, were to be required to be collected from households in the future then producers would be expected to cover these costs. However, in some cases these items are collected and recycled already. We would recommend that the system is sufficiently flexible to allow for the costs of other materials than those which are mandated should be able to be recovered too if they contribute to the producers' targets.*
- *Payments which are sensitive to the cost of managing household packaging waste in the residual stream is sensible.*
- *However, we are concerned that the reference costs which will be used for making payments will properly reflect the situation throughout Northern Ireland.*

**27. Do you think we have considered all of the costs to councils of managing packaging waste?**

*No.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *The consultation document notes that producers should not be expected to cover the costs of inefficient service delivery and their financial contribution should not exceed the costs necessary to provide those services (Section 1). However, we are concerned that the detail is not provided to understand how the efficiency of a collection service will be assessed and whether, if some costs have been excluded, a service may be erroneously judged as being inefficient.*
- *The need to provide consistent collections, including the additional separation of materials, is likely to require additional bulking bays for separate materials at transfer facilities. It is unclear if the full costs of additional bulking bays at transfer facilities have been incorporated.*
- *Thirdly we are unsure if collection depot running costs have been included.*
- *A key piece of work is to understand how much the costs of managing packaging waste vary between councils. We are also concerned that the payments for packaging waste in residual waste which will be based on the average disposal gate fee for household waste for landfill or incineration, using either national average rates or regional average rates have sufficient granularity. If residual waste is transported to a region with very different disposal costs it is important that this is reflected in the payments so that the producing local authority is properly recompensed.*

*There is also a lack of clarity about items recycled from residual waste such as in an MBT plant.*

*Also, as mentioned in the response to Q.10a, we are concerned that the following costs might be missed:*

- *the costs of making household waste and recycling centres available to the public for receiving packaging waste*
- *well the costs of clean-up of littered and fly-tipped packaging*
- *the costs of collecting packaging that is within the residual waste stream as well as the packaging within the dry recycling stream*
- *the costs of analyses to determine the quantities of packaging materials within the residual waste streams*

**28. Do you agree with our approach to making payments for the collection of household-like packaging waste for recycling?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *We support the principle of payments for the collection of household-like packaging waste for recycling being similar to those for household waste, namely a formula which takes into account the cost of collection, proportion of target recyclable packaging materials in the waste stream and weight of target materials recovered for recycling. However, our comments regarding omissions as set out in response to question 27 also apply to household-like packaging waste collected from businesses.*

**29. Should businesses producing household-like packaging receive a payment for the costs of household-like packaging waste in residual waste?**

*No.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *There should already be an incentive for businesses to recycle because they pay for the costs of their waste service, so a payment should not be needed. However, if it would help to capture more of the material then it perhaps could be considered at a later date.*

**30. Are there other factors, including unintended consequences that should be considered in determining payments to:**

**(a) Councils?**

**Please explain the reasons for your response and provide any information to support your view.**

*There will be a period of transition as the new EPR system is implemented. Two options are provided for in the consultation document regarding the ownership of packaging waste recovered for recycling which need to be factored into considerations regarding payments to councils. If ownership of material is retained by producers then councils could be paid their gross costs and hence would no longer bear the risk of fluctuating material prices. Or, as now, councils could continue to receive income for the sale of their recyclable packaging materials and this income would need to be taken account in payments made to councils as producers are required to pay net costs. During the transition period between the current and new regime and depending on which option above is considered there may be a need to consider operating both systems side by side. Transitional arrangements should be taken into consideration.*

**(b) For the collection and recycling of household-like packaging waste?**

**Please explain the reasons for your response and provide any information to support your view.**

*None to note.*

- 31. Do you have any information that would help us to establish the costs incurred by councils and other organisations of cleaning up littered and fly-tipped packaging items?**

*No.*

- 32. How do you think producer fees could be used to improve the management of packaging waste generated on-the-go?**

- *One option may be for councils to receive an additional payment if their on-the-go recycling system is identical to the minimum standard (dry materials) for kerbside services. This could be introduced at a later date but it would be necessary not to disadvantage smaller rural authorities with limited on-the-go provision.*
- *Another option would be to ensure that communications provision included on-the-go so that there would be an incentive for councils to make their on-the-go provision consistent with their kerbside service.*

- 33. Do you have any information that would help us to establish the costs of collection and disposal of increased on-the-go provision?**

- *No – because on-the-go material is mixed with household kerbside collected waste for disposal so we do not have separate costs available.*

- 34. Do you agree that provision for the take back of single-use disposable cups for recycling should continue to be developed a voluntary basis by business prior to a government decision on whether disposable cups are included under an EPR scheme or DRS?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *Given the volume of single use disposable cups being used and thrown away and the voluntary measures already in place the Government should take a short amount of time to review the evidence on the effectiveness of these schemes and then implement a mandatory regime.*

- 35. Do you think the recycling of single-use disposable cups would be better managed through a DRS or EPR scheme?**

- (a) **DRS**
- (b) **EPR**
- (c) **Both**
- (d) **None of these options**

**Please briefly state the reasons for your response and provide any information to support your view.**

(c) *Both.*

- *EPR would encourage producers to shift away from single-use and/or a move to more easily recyclable single use cups.*
- *DRS would encourage consumers to return their disposable cups for recycling or reuse*
- *DRS could be a good way to incentivise reuse, rather than just return for recycling.*

**36. Do you think a recycling target should be set for single-use disposable cups?**

(a) **Yes**

(b) **No**

(c) **I neither agree nor disagree**

**Please briefly state the reasons for your response and provide any information to support your view.**

- *No – because it would be preferable to incentivise reuse rather than recycling.*

**37. Should producer fees be used to support local service-related communications delivered by councils?**

*Yes.*

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

- *We support the use of producer fees for local service-related communications, but this support could be on the proviso that suitably flexible national branding is used and that the money is ring-fenced for communications.*
- *Local communications can be targeted and customised and are a vital part of the communications mix, reducing the ‘bystander bias’ of national activity. Examples from other sectors to support the need for local communications including the National Blood Transfusion Service which became far more effective at gaining blood donors when it changed its communications from national messaging about giving blood, to a more localised approach saying that the local hospital was running low on supplies. Spotify has also localised its communications to attract more users.*
- *Local communications will also be particularly important in the transition period before consistency of collections is in place across each nation.*

**38. Should producer fees be used to support nationally-led communications campaigns in each nation?**

*Yes.*

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

- We suggest that it is appropriate for funding to be used for national branding, research and communications materials but not for communications campaign delivery until consistent collections are in place.*

**39. Are there any circumstances where producers should be exempt from contributing to the cost of communications campaigns?**

*No.*

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

- We cannot think of any reasons for exemption.*

**40. Do you agree it should be mandatory for producers to label their packaging as Recyclable/Not Recyclable?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- Because as noted in our response to question 6 consumers are often confused about what to do when they come to dispose of a product and its packaging which leads to less effective recycling and higher levels of recycling contamination than we want.*

**41. Do you think that the percentage of recycled content should be stated on product packaging?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- Because labelling about the recycled content of the packaging would reinforce consumer messaging about the outcome of recycling, i.e. that the material consumers recycle gets made into new products.*

**42. If you responded yes to the previous question, how could recycled content information be provided to consumers?  
Please describe briefly.**

- The labelling could be colour coded like energy efficiency ratings.*

**43. Do you have any other proposals for a labelling system?  
Please describe briefly.**

- No.*



- 44. Do you have experience to suggest an appropriate lead-in time for businesses to incorporate any mandatory labelling requirements?**

*We have no meaningful information that would enable us to provide a response.*

- 45. In your view, are the estimates made in the Material Flow reports for packaging waste arisings the best available data?**

*I do not know / I do not have enough information.*

- 46. Are you aware of any other factors which may affect the estimates of packaging waste entering the waste stream?**

*No.*

- 47. In your view, are there other factors which may affect the amounts of obligated tonnage reported?**

*I do not know / I do not have enough information.*

- 48. Do you agree with the packaging waste recycling targets proposed for 2025?**

*Yes.*

- 49. Do you agree with the packaging waste recycling targets proposed for 2030?**

*Yes.*

- 50. Please provide your views on the policies and actions that could help us achieve an even higher overall packaging recycling rate, for example 75%, as well as your views on the costs associated with doing so.**

*We have no meaningful information that would enable us to provide a response.*

- 51. Do you foresee any issues with obtaining and managing nation specific data?**

*This is not a question that we are in a position to answer.*

- 52. Should a proportion of each material target be met by “closed loop” recycling, e.g. as is the case for glass recycling targets?**

*Yes – ideally.*

**Please briefly state the reasons for your responses and provide any information to support your view.**

*As we seek to transition to a more circular economy it would be helpful if the producer responsibility packaging waste regulations could assist us to do so.*

*However, the practicalities of closed loop recycling may prevent the immediate implementation of such a requirement.*

**53. Should government set specific targets for individual formats of composite packaging?**

*Yes – ideally.*

**If yes, what key categories of composite packaging should be considered? Please briefly state the reasons for your responses and provide any information to support your view.**

*We do not have sufficient knowledge and detailed information of the packaging sector that would enable us to provide a response. However, we do support the principle of setting targets for composite packaging recycling.*

**54. Do you agree with the proposed interim targets for 2021 and 2022 set out in Table 6?**

*Yes.*

**Please briefly state the reasons for your responses and provide any information to support your view.**

*The targets proposed take account of current performance and the required trajectory, so seem reasonable, although it is unclear if any implications of Brexit have been incorporated.*

**55. Do you agree with the proposal to increase the allocation method percentage to 35% for 2021 and 2022?**

*We are not aware of any conclusive evidence that would enable us to provide a response.*

**56. Overall, which governance model for packaging EPR do you prefer?**

*(a) Model 2 – Single not-for-profit scheme.*

**Please briefly explain your preference.**

- Many other countries operate a single governance model – so it is a well-established approach for packaging compliance and the costs and operating model are known.*
- A single governance model simplifies the current regime of competing compliance schemes which has delivered compliance and at a low cost but which has led to a fragmented approach where the whole scheme costs and investment back into recycling collection services is not as transparent as we would wish.*
- Model 2 is underpinned by modulated fees which we believe will be the best approach for changing producers' choices towards the use of easy-to-recycle packaging.*

**57. If you had to modify any of the models in any way to make them better suited to achieve the principles and outcomes government has set for packaging EPR what changes would you suggest?**

- *Model 1: Enhanced near-to-business as usual - compliance schemes.*
- *Due to the competitive nature of the market under this model, schemes would compete for local authority services as with the WEEE compliance approach now. In order to provide a comprehensive service, it would be necessary to include a mechanism to prevent the most costly-to-collect-from councils from being without a compliance scheme provider into which all schemes would have to contribute.*
- *This model requires the transfer of a proportion of funds to an independent board which would run communications campaigns on behalf of the schemes. In order to ensure that this worked well it would probably be necessary to establish a governance structure whereby one of the compliance schemes took the legal lead. Prior to the establishment of WRAP the National Waste Awareness Initiative as it was then known, (now Recycle Now) was run by a board. However, because there was a need to let contracts to communications agencies, research agencies etc. that board then had to become a legal entity in order effectively deliver the campaign. A quicker approach is to let one of the member organisations take the lead.*
- *The complexity of each compliance scheme working alongside the DRS would possibly also require a combined management body to ensure a coherent system was created.*
- *Model 2: Single not-for-profit producer management organisation.*
- *Model 3: Separate schemes for household/household-like packaging and commercial/industrial packaging.*
- *Data collection management would be one of the most difficult aspects of this model, because with different schemes responsible for household/household-like packaging and commercial/industrial packaging no-one organisation would have a complete picture of the progress towards recycling target achievement. A data sharing arrangement would be required with one of the schemes taking the lead for providing information to government.*
- *Communications funding for reducing littering would also need to be co-ordinated between the schemes because communications to reduce littering does not necessarily need to distinguish between the sources of the litter or if it does communications require co-ordination.*
- *Model 4: Deposit-based government managed system.*
- *The consultation document notes that the Government has not found a similar scheme operating elsewhere so it could include a number of unknown costs and risks.*

**58. Do you have any concerns about the feasibility of implementing any of the proposed governance models?**

- a) Yes
- b) No

**If yes, please provide specific reasons and supporting information for each governance models that you have concerns about.**

*All of the models are feasible, but some as indicated above would require more time and complex structural arrangements to put be put in place in order to make them effective.*

**59. Do you think that any of the governance models better enable a UK-wide approach to packaging producer responsibility to be maintained whilst respecting devolved responsibilities?**

*Yes – Model 2, because there could be single not-for-profit management organisations within each nation.*

**60. Stakeholders have suggested that a compliance fee mechanism similar to the arrangements currently in place under the WEEE producer responsibility scheme should be introduced if a competitive evidence market continues to operate such as in Model 1. Do you agree?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- *Firstly because of the requirement to provide support for authorities who have not been able to award a contract to a compliance scheme for whatever reason. The compliance fee can be set to ensure that each scheme pays into a fund which can support the provision of services to such councils.*
- *Secondly because it would potentially be able to fund comprehensive communications.*

**61. Should a Packaging Advisory Board be established to oversee the functioning of the EPR system and the compliance schemes in the competitive compliance scheme model 1 or do you think other arrangements should be put in place?**

- (a) Packaging Advisory Board
- (b) Other – please provide details

**Please briefly state the reasons for your response and provide any information to support your view.**

*We are unsure about the alternatives so cannot comment upon this question.*

- 62. Please let us know your thoughts as to whether the proposed single management organisation should be established on a not-for-profit basis or as a government Arm's Length Organisation.**

*There are pros and cons of each approach but on balance we recommend a non-for-profit basis.*

- 63. If such a management organisation is established as not-for-profit, one option is for government to invite proposals from potential operators and then issue a licence to operate for a defined period of time. Do you agree with this approach?**

*Yes.*

- 64. Should a single scheme be established for household/household-like packaging and C&I packaging as described for model 2?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

*Because a single scheme can ensure a co-ordinate approach to data collection and reporting of the same.*

- 65. Or, should there be a separate system for managing compliance for household/household-like packaging and C&I packaging as described for model 3?**

*No.*

**If no, do you have suggestions on an alternative approach?**

*This may be better addressed by others who are closer to the detail of how compliance can operate.*

- Q66. Under model 4 are producers more likely to:**

- (a) Manage their own compliance?**
- (b) Join a compliance scheme?**

**Please briefly state the reasons for your response and provide any information to support your view.**

*We have no meaningful information that would enable us to respond.*

- 67. Do you agree that government should seek to ensure export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

arc21 are hopeful the introduction of these measures will help to improve the economic climate and proportionately more of the packaging waste will be recycled locally. However even with local developments in infrastructure the option to export will continue to exist. Ensuring appropriate standards and transparency will be important to ensure competitive fairness and assist with public perceptions.

- 68. Do you agree that measures identified here would help ensure the export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

arc21 broadly agrees that the measure identified could assist in improving the system regarding the export of packaging waste. However, the system will only ever be as good as the regulation of it and if changes are to be made, they must be backed up with appropriate resources for the regulators to undertake the actions they need to maintain the system in the desired manner. The measures proposed need to include this in their design and ensure that adequate funds are generated to undertake appropriate regulatory activities in relation to the export of packaging waste.

- 69. Have we missed potential measures that you believe need to be considered alongside those measures we have proposed?**

*No.*

- 70. Do you have any concerns about the feasibility and / or costs of implementing any of the proposed measures?**

*Yes.*

**If yes, please provide specific reasons and supporting information for each measure that you have concerns about.**

*The transition period will be complex as producers and councils move to the new system, consistent collections come into force and a DRS is implemented, assuming that all three new measures are implemented. Coupled with any complexities introduced as a result of Brexit, this could lead to unforeseen delays and costs.*

- 71. Do you agree that accredited reproprocessors and exporters should be required to report their financial information?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view. If you answered no, how would you suggest**

**transparency is provided on how income from the sale of evidence has been used to support capacity building?**

*A requirement to report financial information will provide confirmation to show how the income from the sale of evidence has been used to support capacity building, thereby supporting the transparency principle number 8 of the governance principles behind the reform to the packaging regime.*

- 72. Should accredited reprocessors and exporters be required to generate evidence for every tonne of packaging waste that they process?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

*arc21 believes that evidence for every tonne of packaging waste should be generated where this is of relevance to the governance model that has been chosen. We believes there is merit in keeping market trading to a minimum within the new system to then mitigate against some of the issues that have caused problems with the PRN system.*

- 73. Should accredited reprocessors and exporters be required to report on the packaging waste they handle monthly?**

*Yes.*

- 74. Do you think that any additional measures to those already described would be required to ensure transparent operating of the evidence market in model 4?**

*Yes.*

**If yes, please provide details.**

*The risk with this model is that schemes pay more than they need at the start of the year. Accurate estimates would be required, particularly for small businesses where paying the fee up-front could cause unnecessary cash-flow difficulties.*

- 75. Are there any additional requirements that should be placed on compliance schemes to ensure greater transparency of their operations and reporting?**

*No.*

**If Yes, please briefly state the reasons for your response and provide any information to support your view.**

- 76. Under a reformed system do you think compliance schemes should continue to be approved by the existing regulators or do you think a different approach is required?**

*Yes, approved as now.*

- 77. Are there any additional requirements of a single producer organisation to ensure transparency of its operation and reporting?**

*Yes.*

**If yes, please briefly state the reasons for your response and provide any information to support your view.**

- 78. Do you think there is a need to make more information on packaging available to consumers?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

*We understand there is a perception of confusion about the recyclability of packaging and whether recycling information on packaging refers to the product or the packaging. In particular, we also find that residents want information about why if you take two different products made of the same material, one may be recyclable and the other not. A single link to a helpline and a website containing comprehensive packaging recycling information may suffice.*

- 79. Are there other datasets that will be required in order to monitor producers in any of the proposed models?**

*Don't know.*

**If yes please explain which datasets will be needed.**

- 80. Is there a specific material, packaging type or industry sector whereby producing accurate data is an issue?**

*Don't know – this is a question for others to answer.*

**If yes, please provide further information on where producing accurate data may be an issue.**

- 81. Do you think a single database, as opposed to the current range of methodologies available, would be an effective alternative?**

*Yes – if it is possible.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 82. Do you agree that compliance schemes (models 1 and 3), the producer management organisation (model 2) or the scheme administrator (model 4) should be responsible for carrying out audits of producers, which should be reportable to the regulators?**

*Yes.*



**Please briefly state the reasons for your response and provide any information to support your view.**

- 83. Do you support the broadening of legally enforceable notices to obtain required information?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 84. Are there other enforcement mechanisms that should be considered which would be timely and effective to bring producers into compliance, for example in relation to free riders?**

*Unsure.*

**If yes, please explain which other enforcement mechanisms should be considered.**

- 85. Are there any further data that should be required to be collated / collected via compliance schemes or a single management organisation?  
Please provide brief details**

*It would be helpful to link the data sets in a reformed EPR with the number and type of complaints received through the packaging essential requirements regulations. In theory with a better EPR scheme and improved design for recyclability there should be fewer complaints about packaging design, but it would be interesting and useful to capture this information.*

- 86. Do you think a penalty charge, as described, is the correct lever to ensure packaging recycling targets are met?**

*I do not know.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 87. Should stakeholders other than reprocessors or exporters be able to issue evidence of recycling?**

*No.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 88. Are there any additional enforcement powers that should be applied to waste sorters, MRFs and transfer stations handling packaging waste?**

*No.*

**If yes, please explain which other enforcement powers should be available.**

- 89. Do you agree with the proposed amendments to enforcement powers relating to reprocessors and exporters?**

*Yes.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 90. Do you have any evidence to indicate that under any of the proposed governance models the likelihood of waste packaging being imported and claimed as UK packaging waste might increase?**

*No.*

**If yes, please provide information on any evidence you have.**

- 91. Is the current requirement for a sampling and inspection plan and subsequent auditing by the regulator sufficient to address any misclassification of imported packaging waste?**

*Unsure.*

**Please briefly state the reasons for your response and provide any information to support your view.**

- 92. Are there other mechanisms that could be considered that would prevent imported UK packaging waste being claimed as UK packaging waste under the proposed governance models?**

*Unsure.*

**If yes, please explain which other mechanisms could prevent imported packaging waste being claimed as UK packaging waste.**

- 93. Do you have any additional data or information that will help us to further assess the costs and benefits (monetised or non-monetised) that these reforms will have?**

*No.*

- 94. Do you have further comments on the associated Impact Assessment, including the evidence, data and assumptions used? Please be specific.**

*No.*

- 95. If you have any other views or evidence that you think we should be considering when reforming the packaging waste regulations, which you have not yet shared, please add them here.**

*Nil*

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## **Consultation on Introducing a Deposit Return Scheme in England, Wales and Northern Ireland**

### **Introduction**

arc21 is a Local Government sector entity embracing six Councils located along the Eastern Region of Northern Ireland which covers approximately 33% of the land base, populated by approximately 59% of the national population and accounts for approximately 60% of the national Local Government controlled municipal waste arisings.

The establishment of arc21 together with its functionality has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.

In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.

The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council.

### **Report**

arc21 welcomes the opportunity to respond to this consultation and, prior to answering the specific questions contained in the consultation document, we would offer the following comments.

The Government have taken a conscious decision to launch this consultation in conjunction with three other consultations of which two are applicable to Northern Ireland i.e. Consultation on Plastic Packaging Tax, and Consultation on Reforming the UK Packaging Producer Responsibility System. The third Consultation on Consistency in Household and Business Recycling Collections in England is not applicable to Northern Ireland. arc21 understands this was a conscious decision in view of the strategic linkage between the consultations. This was reinforced at various events attended during the consultation period including the multi sector event held in Belfast on 12 March 2019.

In view of the applicability of the collection consistency consultation, it would not be appropriate for arc21 to respond to the aforementioned consultation document. Nevertheless, there is a clear linkage between all the consultation documents, and arc21 would wish to point out the position in Northern Ireland is different from the rest of the UK in a number of aspects e.g. market conditions, base costs, land border with the Republic of Ireland, council functions etc.

In general, arc21 would have some concerns around the implementation of any DRS, particularly the timing if it is prior to the introduction of Packaging Responsibility Reform. Our preference would be to await the introduction of the Packaging Responsibility Reform before looking to introduce DRS.

Given the differences in Northern Ireland, arc21 would strongly advocate direct and material engagement with Northern Ireland Council representatives on the future development of proposals.

Finally, given devolved administration's role and responsibility in this matter it would be helpful if any subsequent economic assessment contains costs pertinent to each devolved administration area.

## **Questions**

**1. Would you like your response to be confidential?**

*No.*

**2. What is your name?**

*arc21*

**3. What is your email address?**

*info@arc21.gov.uk*

**4. Please provide information about the organisation/business you represent**

*arc21 is a Local Government sector entity embracing six Councils located along the Eastern Region of Northern Ireland which covers approximately 33% of the land base, populated by approximately 59% of the national population and accounts for approximately 60% of the national Local Government controlled municipal waste arisings.*

*The establishment of arc21, together with its functionality, has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.*

*The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council.*

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

*In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.*

6. **Does your organisation have any recent experience of a DRS or related policy schemes? If so, can you please briefly explain your experiences?**

*No.*

7. **Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?**

*Yes, and would actively encourage such engagement.*

8. **Do you agree with the basic principles for a DRS?**

*Yes, but the principle of 'full net cost recovery' (FNCR) should also be a key principle so that producers always have the full financial incentive to minimise the impacts of their products post-use. A DRS established as part of a wider EPR regime ensures clear responsibility for end-of-use management of resources and should have a positive impact on wider public and consumer behaviour. We would also reiterate concern around the timing of its introduction and the reference to await the introduction of the Packaging Responsibility Reform before looking to introduce DRS.*

9. **Should the following materials be in scope of a DRS:**

**a. PET bottles**

*Yes - Already widely recyclable.*

**b. HDPE bottles**

*Yes - Already widely recyclable.*

**c. Aluminium cans**

*Yes - Already widely recyclable.*

**d. Steel cans**

*Yes - Already widely recyclable.*

**e. Glass bottles**

*Yes - Already widely recyclable.*

**f. Other (please specify)**

*All reasonably foreseeable substitutes for the above, as Q.10 below. Also refer to the answer to Q13 which merits some priority given research into litter in Northern Ireland.*

10. **Should the following materials be in scope of a DRS:**

**a. Cartons e.g. Tetrapack**

*Yes - Already widely recyclable and a foreseeable substitute for the materials at Q.9 to which producers might switch if it were not in scope.*

**b. Pouches and sachets, e.g. for energy gels**

*Yes - A foreseeable substitute for the materials at Q.9 to which producers might switch if it were not in scope.*

- 11. If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?**

*Yes - Incentives to refill should not be limited to glass. Waste prevention should be clearly treated as superior to recycling in the architecture of the DRS. In particular for water, schemes to promote water fountains and/or shops willing to top-up people's water bottles with tap water should be supported above recycling.*

- 12. Should the following drinks be in-scope of a DRS:**

**a. Water**

*Yes - But with incentives and/or encouragement to reuse too, as all such bottles could be re-filled a number of times by the original consumer for his/her own use.*

**b. Soft drinks (excluding juices)**

*Yes.*

**c. Juices (fruit and vegetable)**

*Yes.*

**d. Alcoholic drinks**

*Yes (all) - We can see no rationale for exempting any types of alcoholic drinks.*

**e. Milk containing drinks**

*Yes.*

**f. Plant-based drinks (such as soya, rich almond and oat drinks)**

*We believe these should be treated the same as milk bottles. From the resources and waste management perspective, plant-based drink bottles should be in-scope, but this may require other mitigating measures from a public health perspective, particularly when considering those who cannot consume dairy products. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles and non-dairy equivalents are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure Full Net Cost Recovery (FNCR) of packaging of this material placed on the market.*

**g. Milk**

*From the resources and waste management perspective, milk bottles should be in-scope, but this may require other mitigating measures from a public health perspective. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure FNCR of packaging of this material placed on the market.*

**h. Other (please state which)**

*Yes - The principle should be that all drinks containers are in-scope unless explicitly designated as being not in-scope but should be covered within the EPR to ensure FNCR of packaging of this material placed on the market.*

**13. Do you think disposable cups should be in the scope of a DRS?**

**a. Disposable cups made from paper with a plastic lining (such as those used for coffee)**

*Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups.*

**b. Disposable cups made of plastic (such as those used in vending machines)**

*Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups.*

**14. Do you agree with the proposed material flows as described above?**

*No.*

*1) The role of councils and our waste handling routes is missing, yet we will be collecting these drinks containers in litter, recycling and residual waste. It is essential that the EPR consultation's commitment to 'full net cost recovery' is implemented fully if councils are not to receive the deposits, unless they act as 'vendor' or as a return point.*

*2) We suggest potential confusion may be avoided between DRS terminology and EPR/PRN terminology if the term "packer-filler" is used here rather than "producer".*

**15. Do you agree with the proposed financial flows as described above?**

*No. - Unredeemed deposits should not be retained by the DMO or their value returned to producers in a way that creates a perverse incentive not to maximise deposit returns, which may well be the most expensive form of producers' compliance. In essence, the flows as set out could be viewed as seen as an obstacle to the aims of DRS and could affect public acceptance because the 'producers' will get their money back to fund the DRS and potentially make a profit.*

*Additionally, we would like to flag that the council role is missing from Figure 1 (p.25), but that it is not possible to determine how our role should be shown given that we do not know if/how the same drinks containers will be provided for in new EPR policies and structures. The key guiding principle however must be that of 'producer responsibility' such that through 'full net cost recovery' Councils are no longer paying for these wastes.*

**16. Should producers obligated under a DRS be:**

**a. Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?**

*No.*

**b. Also obligated under the reformed packaging producer responsibility system for the same packaging items?**

*No.*

**c. Other (please explain)**

*Yes - We believe any DRS should be fully integrated into a wider EPR scheme.*

**d. I don't know/I don't have enough information**

*N/A.*

*The possibility of creating loopholes and/or double-obligations appears too great in such a multi-faceted new regime, and the best way to avoid this risk would appear to have all such schemes run by a single body.*

- 17. If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?**

*arc21 believes that all such schemes should be run by a single body to minimise both the double-charging risk and the possibility of creating compliance loopholes.*

*If the two schemes are not run by a single body the DMO will need to be fully linked to the EPR scheme, this could be done through shared representation across both schemes.*

- 18. Do you agree that the DMO should be responsible for meeting high collection targets set by government?**

*Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance. The targets should be published on a regular basis and set out responsibilities & accountabilities for meeting such targets.*

- 19. Should the DMO also be responsible for meeting high recycling targets set by government?**

*Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance.*

*However the ongoing statutory role for councils, both collection & disposal functions needs to be taken into account to prevent unintended consequences of different bodies "chasing target materials" such that the costs to society are not minimised.*

- 20. Should unredeemed deposits be used to part-fund the costs of the DRS system?**

*No - Unredeemed deposits should not go back to the DMO in a way that then subsidises the cost of compliance to the DMO and producers. Rather they should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles.*



- 21. If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?**

*No - Unredeemed deposits should not go back to Government. They should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles.*

- 22. Do you have alternative suggestions for where unredeemed deposits could be allocated?**

*Yes - Unredeemed deposits should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles.*

- 23. If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:**

**a. Industry (drinks producers)?**

*Yes.*

**b. Government?**

*Yes.*

**c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)?**

*Yes.*

**d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)?**

*Yes.*

**e. Other (please specify)**

*Yes - Councils, as we manage a large proportion of these items, and although we expect to manage a declining proportion, we will continue to have an interest from the litter and wider public health points of view.*

*Northern Ireland's public perception is that it is the councils have a major and significant role to protect and be accountable for the local environment and amenity, and as such Northern Ireland council representation is key.*

- 24. Should there be government involvement in the set-up/running of the DMO body?**

*Yes – The Government must remain the primary body to ensure the EPR targets are met. The Government may discharge its delivery responsibilities through a DMO and its regulatory responsibilities through the Environment Agencies, but arc21 cannot see how the Government will not be involved in the set-up/running of any DMO.*

**25. Do you agree with the government's proposals that a DMO would:**

**a. Advise government on the setting of the deposit level/s**

*Yes.*

**b. Set producer/importer fees**

*Yes.*

**c. Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers**

*Yes, and be accountable for the funds.*

**d. Set and distribute the handling fees for return points**

*Yes.*

**e. Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?**

*Yes.*

**f. Be responsible for maintenance of reverse vending machines (RVMs) and provision of bags/containers to those running manual return points**

*Yes.*

**g. Own the material returned by consumers**

*Yes.*

**h. Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts**

*Yes.*

**i. Fund counting sorting/centres – and manage the contracts for counting/sorting centres**

*Yes.*

**j. Be legally responsible for meeting the high collection targets set by government for drinks containers within scope of the DRS.**

*Yes.*

**k. Measure and report recycling rates to government**

*Yes.*

**l. Run communications campaigns to aid consumer understanding of the DRS**

*Yes.*

**26. Do you agree with our proposed definition of a producer?**

*Yes. – See response to Q.14*

- 27. Should there be a de minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?**

*We do not have enough information – especially regarding ‘importers’; the financial material flow model does not reflect importers nor align with the requirements placed on the producer, both roles would need further definition.*

- 28. Should a de minimis be based on:**

- a. Number of employees**
  - i. If yes, how many employees?**
- b. Sales figures**
  - ii. If yes, what figure? – The ‘craft’ industry e.g. beer would benefit from this, say, with a low unit sales pa, especially as the business model for most of these businesses is based on ground breaking sustainable container & waste models. arc21 do not have figures.**
- c. Volume/weight of drinks put on the market**
  - iii. If yes, what volume/weight?**
- d. None of these**
- e. Other**

- 29. If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?**

*No.*

- 30. In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO? Do you agree with this proposal?**

*Yes. – This is the only way for the DRS to be accepted and embraced by consumers.*

- 31. Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMs and an IT system?**

*Yes. – In relation to IT systems for drinks containers in Local Authority Controlled Waste, we would hope that the DMO would supply Councils with timely tonnage data such that we can include it in our submissions to WasteDataFlow in order to fully report on the overall recycling rate in our areas. If this was not to happen, there will need to be a requirement to report data so that this information is captured in order to measure if targets are being met.*

- 32. Should producers of drinks within a DRS be responsible for DRS operational costs?**

*Yes – This is an essential part of ‘extended producer responsibility’ and, as such, the costs cannot fall anywhere else without undermining EPR principles.*

**33. Which of the following should be obligated to host a return point:**

**a. Retailers who sell drinks containers in scope**

*Yes. This should include online orders and delivery services (i.e. delivery vehicles should be required to find ways to take used drinks containers back).*

**b. Transport hubs**

*Yes.*

**c. Leisure centres**

*Yes.*

**d. Event venues**

*Yes.*

**e. None of these**

*No.*

**f. Other (please specify)**

*No.*

*For a DRS to be successful, it has to be as convenient as possible for consumers to return their used drinks containers and receive their deposit back.*

*To this end the Government may also wish to think about a class of places which might be permitted (but **not** obliged) to host a return point. This could include educational establishments, places of worship, parks, museums, galleries, sports clubs, conference centres, car parks, etc.*

**34. What might the impacts be on those hosting:**

**(a) Reverse vending machines? Where available, please share evidence to support your view.**

**(b) Manual return points? Where available, please share evidence to support your view.**

*Parties directly affected would better address this but we would presume that space constraints and regulatory permissions may feature in responses.*

**35. Are there any Health and Safety-specific implications that may be associated with hosting return points?**

*Parties directly affected would better address this.*

**36. Is there a de minimis level under which businesses who sell drinks in scope should be exempt?**

*Yes. See response to Q.28.*

**37. Should a de minimis be based on:**

**a. Floor size**

**i. If yes, what floor size?**

**b. Sales figures for drinks in scope**

*Possibly. See response to Q.28.*

**ii. If yes, what figure?**

**c. Number of employees**

*Possibly. See response to Q.28. Or possibly to ensure there are enough staff who can deal with the return and storing of returned items, i.e. one staff member may not be enough, but it is for the retail sector to provide evidence.*

**iii. If yes, how many employees?**

**d. None of these**

**e. Other (please specify)**

**38. Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

*Parties directly affected would better address this.*

**39. Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers? Please provide details.**

*arc21 would not have sufficient information to enable a meaningful response.*

**40. For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?**

*The DMO should take steps to ensure that the “rural broadband” situation is not repeated, enabling/funding Councils to provide the service could be an option, but full cost recovery would have to be formalised.*

**41. What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?**

*See response to Q.40.*

**42. Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?**

*arc21 would not have sufficient information to enable a meaningful response.*

**43. Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?**

*Yes. – Otherwise the DRS would be a failure in the public views and cause more confusion, effectively setting up a two-tier system from the start. It would also support accessibility to the DRS for those who may struggle to get to normal shops, and will likely improve the customer-service offering of these online retailers.*

*However, this should probably only apply to those using the distribution format most commonly associated with the “home delivery” model of online grocery shopping, i.e. staff make a delivery at a pre-allocated time when the resident is at home, using a trolley and crates that they then return empty to their bespoke truck. For drinks that are sold online but distributed through postal services, the provision of a take-back scheme would not be practicable. The containers would therefore have to be able to be returned via RVMs and other return centres.*

**44. Should there be a de minimis under which online retailers would not be obligated to pick up and refund DRS material?**

*No.*

**If yes, should a de minimis for online retailers be based on:**

- a. Sales figures for drinks in scope**
- b. Number of employees**
- c. None of these**
- d. Other (please specify)**

*arc21 does not have sufficient information to advise on this.*

**45. Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.**

*Yes. – It appears to arc21 that such businesses can either manage them on-site (as they probably already do for glass), or they should be helping reduce the OTG problems arising from the products they sell.*

**46. Should there be an opportunity for retailers that don’t stock drinks / those who may not be obligated to provide a return point to ‘opt-in’?**

*Yes. – This will maximise the capture and recycling of drinks containers. As at the response to Q.33 above, this could include educational establishments, places of worship, parks, museums, galleries, sports clubs, conference centres, car parks, etc.*

**47. Do you have any further views, comments or evidence in relation to retailers not already covered above?**

*No.*

**48. How should a DRS account for ‘on-trade’ sites such as bars and restaurants?**

*The “on-trade” is effectively a closed loop so should be an effective model for any DRS*

**49. What do you consider to be the optimum deposit level to incentivise return of drinks containers?**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

*The level of the deposit should be set by the DMO, so that it can be varied in the light of experience. However, it is essential that any additional costs falling to Councils from bin-raiding by people seeking to claim the deposits from other people’s discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of FNCR so that producers do indeed pay the full cost of managing their wastes. Consideration may also be given to include costs of damage to bins, litter from scavenging, street cleaning.*

*Some charities may have useful data on the extent to which their collections of textiles and/or bric-a-brac have been targeted by other people for personal profit.*

*Similarly, the Government may wish to test if there is accurate historic data on the relationship between scrap metal prices and the number of abandoned vehicles removed by Councils, as anecdotally such vehicles once stickered for removal would often be removed by third parties very quickly when scrap metal prices were high.*

**50. Should the deposit level be a flat rate across all drinks containers covered by the DRS?**

*Please see response to Q.49.*

**51. Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?**

*No. – Multi-packs are understood by arc21 to be often used by families etc. for packed lunches, and as such should be included in all types of DRS and at the same deposit level.*

**52. How do you think deposits should be redeemed? Please tick all that apply.**

**a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points)**

*Yes.*

**b. Digitally (for example a digital transfer to a smartphone application)**

*Yes.*

**c. Cash**

*Possibly, so long as appropriate vouchers are very widely available, so that those who do not have reliable access to a bank account are still able to redeem their deposits rather than just face an additional cost that they may struggle to bear.*

**d. Return to debit card**

*Yes.*

**e. Option to donate deposit to charity**

*Yes.*

**f. Other (please state)**

*Councils should be able to redeem drinks containers found in its street cleansing wastes and its recycling and residual waste collections. arc21 would be happy to engage in dialogue about appropriate mechanisms.*

*Also, arc21 is aware that in the past charities collected items such as foil milk bottle tops and newspapers as a way of fund-raising. We therefore suggest that the redemption regime should not prevent registered charities or other organised groups (e.g. schools) from collecting drinks containers and redeeming the deposits.*

**g. None of the above**

*No.*

**53. Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?**

*Yes.*

**54. In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?**

*Yes.*

**55. How do you think transparent financial flows in a DRS could be achieved most effectively?**

*Regular publication of data /evidence setting out internal costs and payments to listed parties in line with public bodies.*

**56. Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?**

**If no, why and is there another body that would be better suited to perform this function?**

*Yes.*

**57. How frequently should the DMO be monitored?  
(This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))  
Other (please specify)**

*Yes. – Assuming the Government will want Councils to include DRS data from their areas in WasteDataFlow (WDF) returns, arc21 believes the DMO should be monitored quarterly (at least for tonnages), with data published in good time for Councils to be able to include the performance in WDF.*



- 58. How often should producers be checked for compliance with the DRS (if compliance is obligated)?**

*Bi-annually, but clearly the regulator must be able to check for compliance at any time it wishes to outside of such routine checks.*

- 59. Should enforcement focus on:**

*All producers.*

- 60. Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?**

*Yes.*

- 61. Are there any points in the system which you think would be particularly susceptible to fraud? Please state.**

*All points have the potential, however the pinch points are in effect those where the “expenses” are paid, and the DMO needs to take this into account.*

- 62. Which labelling/markings on drinks containers in scope would best protect against fraud?**

**Please select all that apply:**

- a. Deposit value amount**

*Yes.*

- b. Marking indicating inclusion in DRS**

*Yes.*

- c. Existing product barcode (containing DRS information when scanned)**

*Yes.*

- d. Other (please specify)**

*arc21 cannot specify, but provision must be made for Councils and their contractors in relation to drinks containers in street cleansing waste, recycling collections and/or residual waste streams.*

- e. None of the above**

*No.*

- 63. How could return via reverse vending machines (RVMs) best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.**

*arc21 would not have sufficient information to enable a meaningful response.*

- 64. How could the process of manual returns best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.**

*arc21 would not have sufficient information to enable a meaningful response.*

65. **How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?**

*arc21 would not have sufficient information to enable a meaningful response.*

**DRS Options – ‘all-in’ and ‘on-the-go’**

*‘All-in’ option*

66. **Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?**

*We do not have enough information, but excluding such containers from the DRS would appear reasonable so long as these containers are captured under other EPR provisions, particularly producers’ FNCR obligations. arc21 suggests that any such exclusions should be set in a statutory instrument so that they can be amended in the light of experience.*

67. **If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?**

- > **3 Litres**
- > **4 Litres**
- > **5 Litres Other**

*Over 4 litres – Please see excluded items as at our response to Q.66.*

**Please state the reasons for your response. Where available, please share evidence to support your view.**

*‘On-the-go’ option.*

68. **Do you agree with our definition of ‘on-the-go’ as less than 750mls in size?**

*Yes.*

69. **Do you agree with our definition of ‘on-the-go’ as excluding multipack containers?**

*No. – Multi-packs are understood by arc21 to be used by families etc. for packed lunches, and as such should be included in all types of DRS.*

70. **Based on the information above, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised below), which is your preferred DRS option?**

*arc21 has no definitive preference in terms of either option. However, on balance we feel there is merit in considering an incremental model of implementation. This may be in terms of pilot schemes and/or introducing ‘on the go’ initially followed by a period of evaluation to which unless it is unfavourable moving to an ‘all-in’ scheme.*

**71. Do you agree with our impact assessment?**

*No. – The funding model is a key piece of data and the current assumptions are vague and where they are stated to “un-monetised” they have never the less been given large social value in the model. In addition there may be differences in the supply chain arrangements and cost base in Northern Ireland which may impact on the assessment.*

**72. Do you think more data is needed? If yes, please state where.**

*Yes – For example on household-like waste tonnages arising and on the extent and range of local authority costs to be recovered under FNCR. It is not clear how Councils can make strategic decisions with the current degree of uncertainty. In addition, further work may be required in terms of the supply chain arrangements for Northern Ireland as well as the relevant cost base.*

**73. Are there other costs and benefits which we have not covered in our impact assessment?**

*The whole area of unintended consequences is absent from the model & IA, especially those for Councils.*

**74. Do you have further comments on our impact assessment? Please be specific.**

*No further comment.*

**75. The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives? If so please briefly describe it, making reference to any available evidence**

*arc21 believes that because of the high modelled cost of a DRS it may be appropriate to defer its introduction in order to assess if other, more economical EPR measures are sufficient to achieve the Directive’s targets.*

**76. A potential option for introducing a DRS could be to start with the ‘on-the-go’ model, and then expand/phase roll-out to ‘all-in’. Do you think this would be an effective way to introduce a DRS?**

*Yes.*

**77. Do you think a DRS would help us to achieve these outcomes? Please briefly state the reasons for your response. Where possible, please share evidence to support your view:**

**a. Reduction in litter and litter disamenity (include expected % decrease where possible)**

*We don’t know, but it is essential that any additional costs/impacts falling to Councils from the disamenity of bin-raiding by people seeking to claim the deposits from other people’s discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of ‘full net cost recovery’ (FNCR) so that producers do indeed pay the full cost of managing their wastes.*

*In calculating FNCR for Councils, producers should be required to make a reasonable contribution to street cleansing costs, perhaps by reference to the volume of their wastes in litter bins. Also see comments in answer to Q49.*

**b. More recycling of drinks containers in scope of a DRS, especially those disposed of ‘on-the-go’**

*Yes in the absence of tangible evidence to the contrary*

**c. Higher quality recycling**

*Yes in the absence of tangible evidence to the contrary.*

**d. Greater domestic reprocessing capacity through providing a stable and high- quality supply of recyclable waste materials**

*It is not clear what “domestic reprocessing capacity” covers. i.e. UK, devolved administrations or includes the Island of Ireland but in principle, yes in the absence of tangible evidence to the contrary.*

**78. Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?**

*Yes in the absence of tangible evidence to the contrary.*

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.**

*The incremental approach suggested in answer to Q70 would help to provide direct tangible evidence.*

**79. Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?**

*At this stage, arc21 do not have sufficient information to provide a meaningful response.*

**80. Do you think an alternative approach would be a better way of achieving the outcomes?**

***Please explain your answer, providing evidence where available.***

*At this stage, arc21 do not have sufficient information to provide a meaningful response.*

**Statutory local authority recycling targets in Wales**

**81. Are there particular local authority considerations that should be taken into account when considering whether to implement either an “all-in” or “on-the- go” model?**

*Not Applicable*

- 82. Are there specific considerations associated with your local authority that DRS policy makers should consider?**  
(Specific examples and any cost estimates, where applicable, would add value to this response).

*Not Applicable.*

- 83. What benefits and/or disadvantages can a DRS provide to your local authority?**  
(Specific examples and any cost estimates, where applicable, would add value to this response).

*Not Applicable.*

- 84. Are there any specific considerations associated with Councils that collect waste from designated DRS return points that we should consider?**  
(Specific examples and any cost estimates, where applicable, would add value to this response.)

*Not Applicable.*

- 85. How should a DRS drive better design of packaging? Please select all that apply:**

**a. Varying producer fees that reflect the environmental cost of the products that producers are placing on the market**

*Yes.*

**b. An additional producer fee for producers using unnecessary and/or difficult to recycle packaging**

*Yes.*

**c. Other (please specify)**

*Yes. – In addition to the above, other fee structures should be possible, as seen fit by the DMO or other over-arching EPR body, in order to achieve Directive targets, subject to the regulator's consent where appropriate.*

- 86. Who should be involved in informing and advising on the environmental cost of products? Select all that apply:**

**a. Government**

*Yes.*

**b. Reprocessors**

*Yes.*

**c. Producers**

*Yes.*

**d. Councils**

*Yes.*

**e. Waste management companies**

*Yes.*

**f. Other (please specify)**

*Yes. – Environmental consultants and/or academics, in order that rigorous and independent life-cycle assessments and cost-benefit analyses can be undertaken on the information provided by the above.*

**87. Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?**

*We are unable to offer a definitive answer per se, but it may be necessary to review legislation as it would apply to retail outlets in order to ensure that they do not need to be permitted as waste transfer stations, and to understand what hygiene implications there may be, particularly in smaller shops where it may be difficult to keep returned used containers fully separate from new stock.*

*Clearly the Government will be looking at how it ensures imported products are managed and subjected to the same obligations as drinks containers filled in the UK. arc21 is not aware of what specific measures will be needed in this regard.*

*Given the Government's stated objective to reduce litter, arc21 suggests that the Government may also want to look into targeted EPR schemes for smoking-related litter and used chewing gum, as both are significant sources of litter/disamenity.*

**88. Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS? Please specify.**

*Please see response at Q.87.*

**Further comments**

*No further comment.*

**89. Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?**

*Government should satisfy itself that proper consideration is given to the situation in Northern Ireland with particular reference to the relationship with the Republic Of Ireland, given the locality, supply chain arrangements and other influencing aspects*

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## **Consultation on Plastic Packaging Tax**

### **Introduction**

arc21 is a Local Government sector entity embracing six Councils located along the Eastern Region of Northern Ireland which covers approximately 33% of the land base, populated by approximately 59% of the national population and accounts for approximately 60% of the national Local Government controlled municipal waste arisings.

The establishment of arc21 together with its functionality has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.

In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.

The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council.

### **Report**

arc21 welcomes the opportunity to respond to this consultation and prior to answering the specific questions contained in the consultation document we would offer the following comments.

The Government has taken a conscious decision to launch this consultation in conjunction with three other consultations of which two are applicable to Northern Ireland i.e. Consultation on Reforming the UK Packaging Producer Responsibility System and Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland. arc21 understand this was a conscious decision in view of the strategic linkage between the consultations. This was reinforced at various events attended during the consultation period including the multi sector event held in Belfast on 12 March 2019.

The tax has been described as the “pull mechanism” with the Reform of the Packaging Producer Responsibility being the “push” mechanism to address the issue of plastic packaging. If the proposed measures are introduced it will be important to ensure the balance between the “pull” and “push” mechanisms are appropriate and can be easily rebalanced if required. Government may wish to consider if the proposed arrangements are appropriate and future proofed to enable it be easily rebalanced or if this could be better achieved by alternative arrangements such as combining measures into one discrete arrangement such as the Packaging Producer Responsibility Reform package to achieve the overarching environmental benefits.

If Government proceeds with a tax, arc21 would advocate that all the funds received are clearly and transparently utilised consistent with the measures associated with the Packaging Producer Responsibility Reform in each of the devolved administrations and with particular reference to the role of Councils.

Finally, given the linkage with the other measures and the devolved administration's role and responsibility in such it would be helpful if any subsequent economic assessment contains costs pertinent to each devolved administration area.

In the context of the tax being introduced, arc21 would respond to the specific questions as follows.

### **Questions**

**1 What is your name?**

*arc21*

**2 What is your email address?**

*info@arc21.org.uk*

**3 Which best describes you?**

**(Please tick only one option. If multiple categories apply to you please choose the one which best describes you and which you are representing in your response.)**

- Business representative organisation/trade body
- Packaging designer
- Packaging manufacturer / converter
- Product manufacturer / pack filler
- Distributor
- Retailer
- Waste Management Company
- Reprocessor
- ✓ Local government
- Community group
- Non-governmental organisation
- Charity or social enterprise
- Consultancy
- Academic or research
- Individual
- Other

**If you answered 'Other' above, please provide details.**



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

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*The establishment of arc21 together with its functionality has been enshrined in various pieces of legislation with the most recent provision being The Local Government (Constituting a Joint Committee a Body Corporate) Order (Northern Ireland) 2015.*

*In essence, it is primarily responsible for activities associated with the production, ongoing development and implementation of a Waste Management Plan for the arc21 area.*

*The six Constituent Councils of arc21 are Antrim and Newtownabbey Borough Council, Ards and North Down Borough Council, Belfast City Council, Lisburn & Castlereagh City Council, Mid and East Antrim Borough Council and Newry Mourne and Down District Council.*

**5 Would you like your response to be confidential? If yes, why?**

*No.*

**6 Do you agree with the government's suggested approach to defining plastic in scope of the tax?**

*Yes, using the definition in the draft Directive on Single-Use Plastics which references Article 3(5) of Regulation (EC) No 1907/2006, is justifiable. Clearly, this definition will need to be used carefully alongside the proposed packaging definition to ensure appropriate materials are being targeted.*

*Any subsequent change to the definition in the draft Directive should be considered for acceptance in the definition of plastic in the scope of the tax, so as to help ensure consistency and to reduce the prospect of confusion, dispute or subsequent legal challenge.*

**7 Do you agree with the government's suggested approach to defining packaging and packaging materials in scope of the tax?**

*Yes, basing the definitions of packaging and packaging materials on definitions in the Producer Responsibility Obligations (Packaging Waste) Regulations 2007, and underlying Packaging Waste Directive (94/62/EC) is justifiable as it provides clarity and consistency. This definition has also been subject to due diligence and has also been held valid for over a decade, which reduces the prospect of confusion, dispute or subsequent legal challenge.*

*Government should test the definition for its use in this new circumstance to ensure that it supports the overall intention of the tax which is to drive markets for secondary plastic material and, in particular, increased demand for post-consumer plastic.*

**8 Is the government's approach to components of plastic packaging consistent with the way businesses operate and packaging is created?**

*This question requires close consideration to the views and responses of those businesses and organisations involved directly and therefore most familiar with creating packaging with different components. From a local government perspective, we agree with the government's approach that the tax would address each component as an individual item. This should stimulate integration (horizontal and vertical) within the supply chain to rationalise this process and take account of resource use considerations. This underlines the need for the tax to be targeted at the point where it can influence initial design considerations and maximise resource efficiency benefits.*

**9 Which of the above options for defining plastic packaging for composite material items do you think works better for the purposes of the tax?**

*Option 2 would appear to be the best option for bringing the most 'plastic packaging' within scope. Focussing on weight would also be expected to have the benefit of evidencing and auditing mass flow analysis of mixed packing manufacturing more easily. Option 1 would generate a loophole for manufacturers to avoid the tax by lowering the plastic element by the relevant amount and, as such, is unlikely to create significant stimulus when it comes to initial design considerations.*

*Again, close consideration should be given to the views and responses of those businesses and organisations involved directly as converters to help ensure that the option selected is optimal and capable of sector wide adherence, scrutiny and challenge.*

**10 Do you think alignment with the reformed Packaging Producer Responsibility regulations is important for the purposes of the tax?**

*Yes, in the context that the measures contained in the tax cannot be incorporated in a new EPR regime negating a need for the tax. Accordingly, considering that with the plastics tax, DRS and a fundamentally new EPR regime, the Government is introducing a whole new range of legislative and fiscal drivers aimed at creating, developing and supporting circular economic models. Alignment is preferable for consistency and to reduce the prospect of confusion, dispute or subsequent legal challenge.*

*For these changes to work each of the drivers needs to be 'pushing and pulling' in the same direction such that not only do we create markets for secondary markets, but through targeting the tax at the design stage we can influence initial decision making which ultimately should also look at additional packaging modes including reusable and refillables, i.e. moving beyond a recycling / reprocessing mind-set.*

*Ideally, alignment should be achieved by refining or expanding the definition in the Packaging Producer Responsibility regulations (PPRR) rather than weakening any definition in the tax regime. However, if that is not achievable then the tax regime should use the most precise and definitive terms required to ensure its effectiveness and ensure appropriate balance is given to burdens on business with the potential for non-compliant behaviour. Within the wider context this means the Government should not be afraid to move away from absolute alignment with the PPR regulations if the advantages of doing so still result in drivers that also work with the wider changes noted above.*

**11 Do you agree with the government's suggested approach to defining recycled content for the purposes of the tax?**

*Yes, subject to the relevant regulatory apparatus being in place we should be looking to support chemical recycling as one of a number of recycling options. Including chemically recycled plastic and other innovative recycling processes in the same category as mechanically recycled plastic will prevent fraud and abuse and will incentivise innovation. It will also make it easier for consumers to make choices across products with claims about origins of recycled content – as there would be no differentiation. Furthermore due to foreseeable increased demand for recycled content it may be a necessary requirement (possibly in the medium to longer term and particularly if the threshold is increased at a later date) to allow exemption to the tax by helping ensure there is enough recyclable content.*

*Using the ISO standard 14021:2016 appears an attractive solution, as it is international standard with clear definitions this means product claims would be consistent across borders and across requirements and could help more easily address issues on the import of products.*

*The Government's preferred position is to include pre and post-consumer plastics as part of the recycled content measure. The risk in this approach is that in order to meet the 30% threshold manufacturers prioritise the use of pre consumer 'waste plastics' generated in the manufacturing process which by their nature will be cleaner and more readably useable compared to post consumer sources. The consequence of this will be a failure to drive demand for post-consumer plastics. Critical to this point will be the need to understand how much pre consumer plastic is already utilised, as well as how much could be utilised in order to properly understand what, if any, changes in manufacturing behaviour would be stimulated by the tax.*

*In terms of concerns about encouraging wasteful manufacturing processes, by the inclusion of pre-consumer material as well as post-consumer material in the definition of recycled content, it is worth bearing in mind that unless the tax rate per tonne is higher than the cost of raw product per tonne then this approach would foreseeably drive up the cost of products, as raw material is a cost and evidence already secured shows a clear preference for new, rather than recycled plastic as the vast majority of plastic packaging is currently made from new plastics.*

**12 Are there any environmental or technical reasons to consider excluding any particular ways of recycling plastic?**

*No. If there is an environmental concern about any alternatives ways of recycling plastic that would be controlled or prohibited through other mechanisms, e.g. permitting or planning regulations. To exclude ways of recycling plastic creates an uneven playing field and may hamper innovation and deprive business of opportunities.*

*However, as the tax is also liable on products imported to the UK which may contain recycled content derived in lower regulatory environments careful consideration should be given to any processes where there is genuine grounds for concern, however to adopt a differentiation approach that would apply to material derived from other countries may open up the opportunity for waste crime and fraud in a way that would be hard to identify or prevent.*

*It is worth considering that such a regime could lead to plastics recycling sourced from mining old closed landfills that contain waste with a high content of heavier plastics, this may or may not be considered a desirable consequence but it is one that would be controlled by other regulatory processes and plastic content recycling from this route should not be discounted as a matter of course.*

**13 Is there any way that the proposed approach to defining recycled content could encourage unintended consequences, such as wasteful manufacturing processes?**

*We find it hard to believe that modern manufacturing businesses would be wasteful to the point suggested in the question as this would result in increased costs and therefore lost profit. However, under the context of definitions to be included in the final legislative instrument(s) it is important for the Government to ascertain what extent manufacturing businesses already recycle pre consumer plastics that arise as waste from manufacturing.*

*A worst case scenario would be a business producing plastic packaging with manufacturing processes that 'waste' 31% of their initial raw material input which is then recycled into the next manufacturing run. By simply changing how they document their processes such a business could claim to be meeting the threshold and pay no tax which in turn makes no contribution to stimulating markets for post-consumer plastics. One possible approach to address such concerns could be to specify a minimum post-consumer plastic content in similar fashion to how glass PRNs are split between remelt and aggregate.*

*Not directly linked to this part of the consultation but it is worth considering that where the regime applies to complex packaging, to minimise or avoid the effect of the taxation regime some producers could seek to reduce plastic content in a way that reduces the effectiveness or lifespan of packaging, thereby creating a risk that it would lead to increases in waste. A similar unintended consequence could arise from joint and several liability where alternatives to plastic usage are adopted in parts of a supply chain to reduce exposure to the risk of having to pick up costs. These possibilities are worthy of consideration but as consumers would influence producers decisions through their choices it is likely that these types of outcome would be limited in time and extent.*

*As stated in response to question 12 it is worth considering that such a regime could lead to plastics recycling sourced from mining old closed landfills that contain waste with a high content of heavier plastics, this may or may not be considered a desirable consequence.*

- 14 Do you agree with the government's preferred approach of a single threshold, and why? If not, what alternative would be better, and what are the risks associated with this? Please explain your answer and provide any supporting information and evidence.**

*Yes, a single threshold for all plastic packaging helps ensure a level playing field between manufacturers of different types of plastic and packaging would make the tax simpler for businesses to administer and minimise compliance risks and furthermore would make it easier for consumers to make choices across products making claims about content. This approach will help introduction of the tax and post implementation reviews can always make refinements as necessary based on evidence and experience.*

*However, detailed consideration should be given to the merit of setting higher thresholds and a mechanism for establishing them (e.g. existing average evidenced content plus 30%) on packaging products where it is demonstrably the case that higher levels than the single threshold being considered are already being reached to ensure that the regime provides a stretch incentive across the sector. This would be a more targeted variation of Option 2 'Setting different thresholds for different types of products' as the principles of its application would be driven by clear association with the recycled content rather than for different types of products.*

*As an alternative to either a single threshold or multiple bands, serious consideration should be given to the use of and a mechanism for the application of an appropriate tax on all and any virgin material content. One benefit of this approach is that it would incentivize and drive all manufacturers towards continued increases in recycled content in a way which a single threshold does not, as a single threshold is only effective up to the level it is set. Another benefit is that it incentivizes increased recycled content whether the starting position for the recycled content of a packaging product is high, medium or low in a way that is more refined than use of multiple tax bands and without the complications and burdens on business that multiple bands would bring or the additional complexity and administration that setting different thresholds for different types of products would bring; it would also remove the need to revisit thresholds or band rates in the future.*

- 15 Assuming a single threshold, do you agree with a 30% threshold for recycled content and why?**

*Yes, we agree and the 30% figures reflect the current target set by the UK Plastics Pact. Based on evidence received that the vast majority of plastic packaging is currently made from new, rather than recycled plastic, 30% is a clearly defined and memorable stretch target that can be understood by consumers, converters and those through the supply chain and if it is readily achieved it can be increased further to incentivise change.*

*The purpose of the tax is to change behaviour as part of an upwards evolution in our manufacturing, resource use and waste management processes which result in a much better overall stewardship of plastics in general. To achieve this the burden that the tax representatives has to result in genuine consideration at the design of stage of how to design plastic packaging to minimise exposure to the tax as well as look at reusable and refillable alternatives.*

*The risk of different thresholds is that design / manufacturing efforts become focused on moving to lower tax rate alternatives as opposed to meeting and exceeding the 30% threshold. However, within this we also think there needs to be 'pull driver' in the form of rewards for recycled contents that go significantly beyond the 30% thresholds. For example to encourage ongoing development and innovation in this area for business that can deliver 40% and 50% recycled content levels there should be some form of motivational reward, i.e. reductions in VAT rates for example which will become available to the UK once we have left the European Union.*

- 16 Are there any products for which it would be very challenging to increase the level of recycled content, and why? If so, please outline the effect of a tax on production decisions and consumption of these items.**

*Because it may be a challenge, or in some instances prohibited to include recycled content, should not mean that relevant products should be exempt of tax or attract a lower rate. Applying tax to these items will help justify the development of alternatives where possible, guide consumers to more sustainable alternatives and generate income which can be deployed in ways to offset the effect of raw material consumption in those products or further incentivize the recycling of those products or other items and thereby more generally increase recycled plastic content, e.g. innovation and research funding.*

- 17 Are there any products for which the use of recycled plastic is directly prohibited in packaging? If yes, please provide details on these products stating the relevant legislation and industry standards as well as the effect of a tax on production decisions and consumption of these items.**

*We have no information that would enable us to provide a meaningful response. We would suggest that should not mean that relevant products should be exempt of tax or attract a lower rate in line with our reasoning to Q.16.*

- 18 What evidence is currently held by liable manufacturers and importers on the levels of recycled content in their plastic packaging and how it might be able to meet the requirements of identifying recycled content levels?**

*We have no information that would enable us to provide a meaningful response.*

- 19 If you are an importer of unfilled plastic packaging or plastic packaging material, what information do you hold on the recycled content? What controls or assurance do you have over the accuracy of this information? How might you influence the level of recycled plastic content?**

*We have no information that would enable us to provide a meaningful response.*

**20 Do you agree with the government's suggested approach of setting a flat rate per tonne of a plastic packaging product? Why?**

*Yes, we agree.*

*Charging a flat rate per tonne appears preferable, is easier to measure, evidence and audit and is more likely to drive innovative design away from new plastic content. To keep the regime easy to enforce and administer and for easier understanding by consumers the flat rate should apply across all polymer types and all products whether they can include recycling content easily or not or where recycled content may be prohibited.*

*Aligning with the general approach used in the PPR Regulation will also make administration of the tax easier. It will make analysis of how well drivers from the plastics tax, DRS and EPR are aligned easier as well. A simple and transparent approach will aid introduction of the tax and will leave scope for evolving the tax as evidence accumulates with experience of its implementation.*

**21 Do you agree with the proposed points at which domestic or imported products would be liable for the tax? If not, at what point in the supply chain do you think the tax point should be and why?**

*Yes, we agree although issues around imported packaging should be monitored closely at implementation as interpretations may vary. Clarity in communicating how the tax works will be important.*

*The proposed points seem logical and in the case in plastic packaging manufacture with multiple stages, we support option 2 which is consistent with the tax point for imported packaging. Consideration should be given to the views and responses of those businesses and organisations involved directly and therefore most familiar the logistics required for the regime to work effectively without creating an excessive burden or system that could be open to abuse and fraud.*

**22 Are there any situations where the proposed tax points would be administratively, practically or legally difficult? Please explain any adaptations that might be necessary.**

*We have no information that would enable us to provide a meaningful response.*

**23 If you are a business that produces or imports plastic packaging, how much of your yearly production, in tonnes, would you expect to be liable for the tax?**

*We have no information that would enable us to provide a meaningful response.*

**24 Do you provide (manufacture or import) plastic material which could be used as packaging without knowing the final use of the product? Is this a common occurrence?**

*We have no information that would enable us to provide a meaningful response.*

**25 Would you support extending joint and several liability for UK production, and for imports?**

*Yes, this level of accountability strengthens the taxation regime, reduces opportunity for fraud and evasion and would elevate the degree of due diligence and quality of data reporting through a supply chain although this would be at an additional cost. Through the supply chain joint and several liability may have the added benefit of encouraging joint working and the development of alternatives to plastic usage to reduce exposure to the risk of having to pick up costs or of reducing the liability where a part of a supply chain collapses.*

*However, there is a risk that where supply chain processes collapse the burden could then fall on companies that are not financially strong enough to meet the cost at a point where it becomes due, particularly if a liability is accrued and then passed on in full. Therefore to protect small businesses an appeal fund could be used that was ring fence funded from the tax income generated and principles for its application established.*

**26 Please outline any issues in relation to routine wastage or spillage that may have an impact on the tax liability.**

*Neither routine wastage nor spillage should affect tax liability. Such exemptions would create loopholes and may allow abuse and or tax evasion. Applying tax in these situations would incentivize waste reduction and spillage prevention.*

*As noted above it is important in design of the tax to understand to what extent plastics that become waste in the manufacturing cycle are themselves recycled. Minimal levels are to be expected and should not impact on the objectives of the tax. However, if such recycling levels are already in the region of the 30% content threshold then the tax in such circumstances will do little to drive demand for post-consumer plastics. As such the Government may need to specify minimum percentages for the use of post-consumer plastics that contribute to the overall 30% threshold.*

**27 Do you agree with the government's initial proposal that the tax at import should only apply to unfilled packaging? If not, what would the effects be? What alternative would you prefer and how would it work?**

*No, we remain to be convinced that the tax at import should only apply to unfilled packaging as this would seem to leave UK manufacturers at an unfair disadvantage. There is a risk to UK based businesses of a shift towards importing products that would previously have been produced in the UK, so that they could be imported pre-packaged and thereby gain a competitive advantage by avoiding a tax. To address this we would urge the Government to include within the enabling legislation that after a certain date, i.e. a sufficient lead time to allow commercial conversations to take place, UK importers of such goods will not be allowed to import finished goods in packaging that doesn't contain 30% recycled content.*



**28 Do you agree with the government's suggested approach for crediting exports?**

*Yes, the approach presented in the consultation appears to be justifiable. However, greater merit should be given to the views and responses of those businesses and organisations involved directly with exports and therefore most familiar with the practical and cost considerations.*

**29 Do you foresee any difficulties in providing appropriate records to demonstrate that packaging has been exported?**

*Yes, a change of this scale across a sector in relation to a new burden is foreseeably going to generate difficulties and those are best articulated by businesses and organisations involved directly with exports and therefore most familiar with the practical and cost considerations.*

**30 Do you agree that the government should seek to exclude small operators? If yes, what would the risks be if the government did not do this?**

*Yes, this seems reasonable but at a level much lower than the current producer responsibility packaging regulations de minimis.*

*If Government did not exclude small operators this would, amongst other things, increase the likelihood of small and specialist and niche businesses failing, of agglomeration of small companies and buy outs leading to the prospect of regional biases for processes developing, mean that issues of joint and several liability may put too large a potential burden on small businesses that would have to secure bonds or allocate resources to address a risk, stifle the innovation that many small companies bring by eroding at their margins to a disproportionate effect thereby restricting funds for product development and growth.*

*Safeguards should be put in place to prevent deliberate fragmentation of the supply chain as a means to fall within the de minimis threshold. An alternative would be to set a lower rate of tax to such organisations so they are at least exposed to the same drivers for behavioural change. However, we do recognise that risks around fragmentation in pursuit of lower tax liabilities would still be an issue for the Government to address.*

**31 Would Option 1a, Option 1b or Option 2 best meet the government's objective of excluding small operators from the tax whilst ensuring the tax has a strong environmental rationale?**

*It appear that Options 1b is preferable from the perspective of protecting small businesses as it takes in to account not just the volume of material but also the turnover, this is the approach used in the Packaging Producer Responsibility system which means it is tried and tested in principle, so any lessons learned from that process should be factored in to decisions made on the approach to relief from this tax.*

*However, this does require another type of information to be provided, i.e. financial, which introduces an additional burden to those participating and administering the regime and introduces the possibility of accounting methods being used to gain tax relief.*

- 32 What factors should the government consider when setting a threshold (either on volume or turnover) or a relief? Do you have any suggestions for appropriate levels? If so, please provide an explanation for why you believe this is appropriate.**

*Full alignment with any changes made to the Packaging Producer Responsibility system in relation to businesses annual turnover and handled tonnes of packaging a year should be considered. This consistency across a sector makes it easier to ensure that any future changes across government are also made in a joined up way as is being achieved through the concurrent consultations in 2019.*

- 33 Would having a de minimis create any significant risks to the effectiveness of the tax at import (including, but not limited to, treatment of multiple imports from the same exporter/manufacturer/brand owner)? If yes, please provide evidence and suggest any additional legislative or operational countermeasures.**

*It does create a risk which could be significant if it is not regulated and audited, however it may be the case that the lower the de minimis the lower the chance of this happening becomes, because the additional burden of significant disaggregation / fracturing of an operating entity or supply chain would in itself introduce additional burdens that would probably not outweigh any perceived gain of tax avoidance.*

- 34 Do you anticipate any risks or issues that would arise from introducing a de minimis that aren't explored above? Please provide details.**

*We have no information that would enable us to provide a meaningful response.*

- 35 Do you agree that the registration and reporting requirements outlined are appropriate? If not, please specify why.**

*Yes, the way the approach is presented in the consultation appears to be justifiable.*

- 36 Please provide details of the estimated one-off costs for registering with HMRC.**

*We have no information that would enable us to provide a meaningful response.*

- 37 Please provide details of the expected one-off and on-going costs of completing, filing, and paying the return.**

*We have no information that would enable us to provide a meaningful response.*

**38 Is the government's suggested approach to compliance proportionate and appropriate? If not, please outline any scenarios that you anticipate may require bespoke compliance powers or penalties?**

*The description provided appears proportionate and appropriate at strategic level but as there is no detail it is not possible to say how effective the system would be in delivering on those principles at this stage.*

*Powers of inspection, sampling and auditing of suppliers of raw materials and suppliers of recycled plastic should be provided for, so that where there are concerns and / or issues in dispute analyses can be performed at a chemical level to justify or disprove claims.*

*Consideration should also be given for a frequency of inspection and/ or audit proportionate to the scale of the operation to prevent fraud at scale, albeit that this detail may well feature in the forthcoming technical consultation. These are themes that should probably feature in the technical consultation that will follow.*

*Finally and in common with the arc21 responses on DRS and EPR, the Government needs to ensure that any additional regulatory burden arising from these proposals is adequately resourced in terms of both skills set and capacity.*

**39 Are our anti-abuse proposals sufficient to tackle the risk of fragmentation (abuse of the de minimis or universal relief) from UK based plastic producers?**

*Yes, from the way the case is presented it appears so, unless there are concerns within HMRC on the effectiveness of the 'connected persons' principle as applied in other parts of the taxation regime. The lower the de minimis the lower the chance of fragmentation becomes, because the additional burden of significant disaggregation / fracturing of an operating entity or supply chain would in itself introduce additional burdens that would probably not outweigh any perceived gain of tax avoidance.*

**40 Is our approach regarding assuring the accuracy of declared recycled content appropriate? If not, please share any other suggestions you may have.**

*It is stated that 'It may be less straightforward to evidence the level of recycled content in imported plastic packaging' and that will be exactly the case and HMRC needs to further consider ways of ensuring the compliance of importers, including the option of using UK based agents for non-established taxable persons. It may be that those operators and organisations closest to this part of the process will provide helpful responses to the consultation, if that isn't the case or there is conflicting views HMRC should consider working with focus groups to get a deeper understanding of issue and the merit of differing solutions.*

*In lieu of an alternative and as yet undefined approach arc21 supports the idea that a lack of appropriate document should result in the tax being applied. However, as with all Government initiatives to support the enabling legislation the Government will need to undertake a comprehensive information and education programme to make sure that all relevant businesses and trade organisations within the packaging / manufacturing sector are well aware of the changes including when the tax is first due.*

*We would further suggest that such comms initiatives are rolled out well in advance to signpost how the tax will work so that relevant business can start to consider and implement the necessary changes well in advance.*

**41 Do respondents believe that using UK based agents for non-established taxable persons may help support compliance?**

*Yes, it may. However, to remove potential for fraud by UK based agents representing non-UK established taxable persons the regime would have to be highly controlled and regularised and penalties for breaches would have to be onerous.*

**42 Are there any further compliance risks that have not been addressed in this chapter, please provide details?**

*The compliance risk of substitute materials (i.e. fraudulent introduction to the system of materials as 'recycled' when they are derived of virgin material and have just been processed) has not really been addressed in terms of how such cases would be proved one way or another.*

*Also changes of recycled content with time and over a tax year are likely and yet not really addressed. For example to avoid a tax cost for a year recycled content could be ramped up in one period of that year in products that would then be sub-standard and could then be sold on (possibly at minimal or nil cost) for disposal or even bought as a fuel.*

*These issues need to be addressed in how regulation and enforcement of the tax is delivered.*

**43 If you are a business, what is your annual turnover?**

*We have no information that would enable us to provide a meaningful response.*

**44 Are you currently obligated under the Packaging Producer Responsibility system?**

*We have no information that would enable us to provide a meaningful response.*

**45 If you manufacture or handle plastic packaging, which sector(s) do you provide it to?**

*We have no information that would enable us to provide a meaningful response.*

- 46 If you manufacture or handle plastic packaging, can you please provide an overview of the types of plastic packaging products as well as the tonnages and the levels of recycled content in each? Do you expect this to change over the next 5 years?**

*We have no information that would enable us to provide a meaningful response.*

- 47 If you manufacture or handle plastic packaging, how much of this packaging is produced domestically, exported and/or imported?**

*We have no information that would enable us to provide a meaningful response.*

- 48 If you process or handle recycled plastic, do you export or import any? If so, how much, and where from/to?**

*We have no information that would enable us to provide a meaningful response.*

- 49 If you manufacture plastic packaging, can you please provide an overview of the prices of some of your plastic packaging products. Can you also provide information on how these costs break down according by material costs, labour costs, other operating costs and profit?**

*We have no information that would enable us to provide a meaningful response.*

- 50 If you manufacture or handle plastic packaging, can you please describe how plastic packaging prices fluctuate? How much do prices vary, and what are the main causes, e.g. fluctuations in exchange rate, oil and other commodity prices, etc.?**

*We have no information that would enable us to provide a meaningful response.*

- 51 If you manufacture or handle plastic packaging, how long does it take you (in months) to increase the recycled content of your product? What factors are important in determining this length of time?**

*We have no information that would enable us to provide a meaningful response.*

- 52 If you manufacture or handle plastic packaging, would the tax incentivise you to speed up any current plans to increase recycled content? To what extent? How quickly?**

*We have no information that would enable us to provide a meaningful response.*

- 53 If you manage waste, how long would it take you to set up the systems required to supply more plastic waste for recycling/recycle more plastic? How much could you produce?**

*Councils collect plastics at either the kerbside and or at Recycling Centres and or via bring banks in various combinations. To supply more plastic for recycling via these routes would currently be an extra financial burden for local authorities involving additional costs including collection, processing and communications costs.*

*Not all plastics are currently targeted for recycling due to the impracticalities of dealing with them or the lack of sustainable and viable markets, meaning systems change would be required at a fundamental level which does require a strong connection with the possible changes to producer packaging responsibility and the significant increase in funding provided to councils.*

- 54 If you manufacture plastic packaging, how would the tax affect the amount and price of product you produce? In cases where you weren't able to increase recycled content, would you pass the price of the tax down the supply chain?**

*We have no information that would enable us to provide a meaningful response.*

- 55 Is there anything else you would like us to note about how your business operates and how you think it would be impacted by the tax?**

*We have no information that would enable us to provide a meaningful response.*

- 56 Unless already covered in your responses to other questions within this document, is there anything else you would like us to note about the impact of the tax, especially any potentially adverse impacts on groups with protected characteristics?**

*If councils are left to pick up any additional burdens as a consequence of a tax regime without adequate funding then any changes could indirectly affect any group with protected characteristics where any council is then forced to make consequential decisions about funding services due to their reduced ability to continue funding existing services to groups with protected characteristics.*

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## Response ID ANON-N7RC-R7S7-D

Submitted to **Consultation on reforming the UK packaging producer responsibility system**

Submitted on **2019-05-10 16:51:41**

### About You

#### 1 What is your name?

**Name:**

Jennifer Stephens

#### 2 What is your email address?

**Email:**

stephensj@belfastcity.gov.uk

#### 3 Please provide information about the organisation/business you represent

**Which of the following best describes you?:**

Local government

**What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):**

Belfast City Council - Waste Management Service

**What is the approximate number of staff in your organisation? (if applicable):**

3000 across the whole Council, 400 approx within the Waste Service

**If you answered 'Other' above, please provide details::**

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

**Please answer below:**

We are the largest local council in Northern Ireland and are a unitary authority, responsible for both waste collection and disposal.

We are members of arc21 and have contributed to the arc21 collective response to this consultation. We are supportive of the arc21 responses, however, where appropriate, we have also added additional, sometimes Belfast specific, comments.

#### 5 Would you like your response to be confidential?

No

**If you answered 'Yes' above, please give your reason::**

### Background

#### 6 Do you agree with the principles proposed for packaging EPR?

Yes

**Please briefly state the reasons for your response. Specifically, if you respond No, please identify which principles you do not agree with and explain why.:**

We support the arc21 response to this Question:

Although implementing the changes requires us to have confidence in the long term commitment for increased financial support to councils. We recognise that the details of the changes and therefore the details of any specific commitments (including distribution of any funding between authorities) would be decided following future consultations if the policies proceed as currently indicated but it is essential that this information is provided as soon as practicable. We are also concerned to ensure that the particular challenges of increasing recycling in dense urban environments is properly calculated and fully recognised in both payment calculations and standards.

- Because businesses will bear the full costs of managing the packaging they handle or place on the market under the proposed new scheme. The principle of an extended producer responsibility (EPR) regime is that producers are responsible for the impact of the products that they place on the market from 'cradle to grave'. Whilst the current packaging EPR makes everyone in the packaging chain, above a de minimis, responsible, it does not make producers responsible for the full costs of managing packaging waste, which undermines the principle of EPR. The consultation document notes that "At most around 10% of costs are covered ; but our analysis indicates that less than 7% of the costs of managing household packaging waste are covered by producers." Therefore, in particular we support principle 3 – that businesses will bear the full costs of managing the packaging they handle or place on the market.

- Because the proposed packaging EPR will better implement the waste hierarchy and more clearly support the principles of the circular economy than the present scheme. The reformed EPR will not incentivise reuse specifically. However, the second proposed principle of the new scheme is that businesses will be

incentivised to reduce unnecessary and difficult-to-recycle packaging and to design and use packaging that is recyclable. As a result, the proposed new scheme should more clearly support the waste hierarchy and the principles of the circular economy than the present arrangement.

- Because it will provide for improved consumer information on packaging which should result in reduced contamination and more effective recycling. For any EPR scheme to work effectively the product users must understand their role and act accordingly. At present, the consumer information obligations for packaging waste are unclear, which coupled with weak enforcement, has led to uncoordinated implementation of the consumer information obligations for packaging waste. This has resulted in different obligated businesses within the current scheme providing different information about how consumers should recycle the packaging on the products that they buy. As a result consumers are often confused about what to do when they come to dispose of a product and its packaging which leads to less effective recycling and higher levels of recycling contamination than we want.

## **7 Do you agree with the outcomes that a packaging EPR should contribute to?**

Yes

**If you answered No, please state which outcomes you do not agree with.:**

In addition to supporting the arc21 response to this question (The accompanying Impact Assessment to this consultation states that the money raised through the system should fund better recycling collections, domestic recycling infrastructure and services under clear conditions that deliver overall system savings. The consultation document does not mention the aim to deliver overall system savings and in fact states that there is sufficient high quality reprocessing capacity in the UK to handle the increasing quantities of packaging waste for recycling) we would also add that, with our experience in Belfast, through "The Collaborative Network" that we are involved with, increased capacity in Northern Ireland is required for the increased range of materials.

We would also be in support of the CIWM draft response to this question:

Yes, with one caveat. While most of the outcomes are linked to tangible delivery mechanisms and / or incentivisation measures (e.g. modulated fees will act directly to deliver the changes to packaging design mentioned), we believe that insufficient attention has been paid to explicit measures to ensure "that there is sufficient high quality reprocessing capacity in the UK to handle the increasing quantities of packaging. Full net cost recovery should ensure that there is more funding in the system to support additional domestic infrastructure but other well documented factors also influence the business case, including market price volatility, challenging export markets, and tighter controls on exports being proposed both in this consultation and through measures currently being debated at an EU level. The plastics packaging tax will act as a driver but a whole system approach needs to be taken to the development of the necessary infrastructure across all materials if the UK is genuinely committed to this stated outcome.

## **8 Do you think these types of items not currently legally considered as packaging should be in scope of the new packaging EPR system?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We are in support of the arc21 response to this question:

- Out of the list of possible additional items (foil, cling film, jiffy bags, paper cups and [rolls of] sandwich bags not currently legally considered as packaging the only one we consider should be included in the new EPR is jiffy bags. We expect, although have no data to verify this, that jiffy bags are used as much by producers and packer fillers as well as in the home e.g. for online sales of products, so for this reason would like to see them included in the EPR. They are also difficult to recycle.

- We would like to see paper cups considered for some type of EPR in due course, but a separate scheme for single-use cups of any type is likely to be more relevant (rather than just focussing on paper ones).

## **9 Which of these two classifications best fits with how your business categorises packaging?**

Not Answered

**If neither, please say why, and provide a description of how your business categorises packaging:**

N/A

## **Part A: 1. Full net cost recovery**

### **10 Do you agree with our definition of full net cost recovery?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

- Whilst arc21 generally supports the definition of full net cost recovery, we feel that there are some gaps which need to be covered. It is important that the coverage of costs properly addresses all the areas associated with the sustainable management of packaging. This needs to include the costs of making household waste and recycling centres available to the public for receiving packaging waste as well the costs of clean-up of littered and fly-tipped packaging. It also needs include the costs of collecting packaging that is within the residual waste stream as well as the packaging within the dry recycling stream. To work out the quantities of packaging materials within the residual stream, composition analyses (or other forms of analysis) will be required, and the costs of these will also need to be covered. We do welcome the inclusion of the costs of providing information to consumers on recycling packaging waste and anti-littering.

- arc21 is unclear how income from the sale of recyclable packaging will be netted off. We are concerned that if the income netted off is an average annualised amount per tonne for example, that it may be insufficient incentive for materials recycling facilities (MRFs) to get the best possible price for the sale of the packaging material for recycling. The way the system is structured will need to ensure that the commercial/market incentives for the trading of recyclate are maintained.



- The consultation document notes that there is an expectation that recycling costs per tonne of packaging will decrease over time. There is no detail in the consultation document or impact assessment about how this has been modelled. It will be important for all parties to understand better how the costs have been and will continue to be calculated in order to understand how 'full cost' recovery has been determined.

In addition, we would stress that, from a Belfast (City Council) perspective, the cost of the clean up and recovery of fly tipped packaging waste can be quite significant.

We would support the proposal (from LARAC) that producers should also fund national and local communication campaigns for recycling and littering as outlined in the consultation.

We would also agree with the CIWM draft comments to this question:

We believe that further work is needed on the extent to which producers are expected to cover the costs of littered or fly-tipped packaging. If producers have:

- made every effort to ensure their packaging is recyclable and is labelled as such in line with any new labelling scheme
- covered the cost of collection, transport and recycling of their packaging – including improvement of 'on the go' recycling collection infrastructure
- covered the cost of disposal of their packaging in the residual waste stream
- contributed to a central communications fund covering recycling and anti-litter messages

then it could be argued that they have discharged their responsibility in so far as they are able and it is questionable whether they should cover the cost of socially irresponsible and/or criminal behaviour by consumers or businesses.

It is important that full net cost recovery covers compliance monitoring and enforcement to ensure transparency, credibility and effectiveness of the system and reduce the risk of free riders.

**11 Do you agree that producers should be required to fund the costs of collecting and managing household and household-like packaging waste? (i.e. all consumer facing packaging)**

Yes

**If No, please briefly state the reasons for your response and state what waste you think full net cost recovery should apply to.:**

N/A

**12 Do you agree that packaging for commercial/industrial applications should be out of scope for full net cost recovery?**

Yes

**If No, please briefly state the reasons for your response.:**

N/A

**13 We would welcome your views on whether or not producers subject to any DRS should also be obligated a under a packaging EPR system for the same packaging items.**

Yes they should

**Please briefly state the reasons for your response.:**

We support the arc21 response to this question:

Whilst arc21 believes that a DRS is likely to reduce the quantity of drinks containers within residual waste, it will not eliminate it. Therefore there will still be costs associated with collecting and managing the drinks containers within the residual waste stream, so EPR is needed to ensure that these costs are covered and encourage producers to do everything in their power to make sure that drinks containers are captured.

In addition, we would stress the importance of establishing an EPR system first and that a DRS would follow.

We support the CIWM draft response to this question:

CIWM believes further consideration of this question is needed should the proposal for a DRS be taken forward. Producers should not be 'double-charged' but if both systems are not closely aligned, CIWM believes that there is the risk of sub-optimal outcomes and unintended consequences – with some members expressing the view that DRS should be integrated into the EPR regime rather than sit as a separate system.

Key considerations include:

- contributing to a DRS scheme does not discharge all of the full net cost responsibilities as defined in this EPR consultation, and this question is not answered adequately in the DRS consultation;
- it is not clear in either consultation how the measures to incentivise recyclability (i.e. modulated fees) would apply to DRS obligated packaging – which is essential to achieving the stated overarching principle of increasing packaging recyclability;
- full alignment is necessary to ensure that neither regime (if they are separate) confers a cost advantage over the other or results in double charging to achieve similar outcomes;
- some DRS obligated material is likely to end up in household waste, so there will at the very least need to be an effective and transparent mechanism for cross-subsidy between the two regimes.

**Part A: 2. Driving better design of packaging**

**14 Do you agree with the development of an 'approved list' of recyclable packaging to underpin the setting of either modulated fee rates or deposits?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Clarity of labelling for consumers can only be brought about if there is an approved list of what can and cannot be recycled, and recycling will be more effective if the labelling is clear. Please see our response to question 6 for evidence of the importance of clear labelling. However, the practicalities are that different MRFs accept different ranges of materials so it will be important to find a way in which the national variability of what can and cannot be recycled is incorporated during any transitional period.

**15 Do you think the payment of modulated fees or the payment of deposits with the prospect of losing some or all of the deposit would be more effective in changing producers' choices towards the use of easy to recycle packaging?**

Modulated fee

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Modulated fee:

■ We support a modulated, placed on the market (POM), fee for producers - whereby they pay fees based upon the quantity and types/formats of packaging they handle - as the best approach for changing producers' choices towards the use of easy-to-recycle packaging.

A modulated fee would send a clear signal to producers and designers to consider end-of-life at the design stage. Fees could be flexible allowing for the fees to be adapted as new packaging types come onto the market such as compostable, or biodegradable packaging or packaging with electronic sensors for example in-built, and could be set to take account of composite materials.

Deposit and fee:

■ This approach is similar to how the energy market operated for a period of time with companies paying upfront based upon an estimate of their annual energy use and then a repayment at the year-end based upon their ranking in the market. It may be useful to look at why this system was changed.

■ In our view a deposit (for recyclable packaging) and fee (for non-recyclable packaging) is likely to be too difficult to operate and potentially make it more difficult for businesses to budget for their annual costs of compliance.

■ Although the deposit and fee approach would potentially be more responsive to market pricing – with deposits returned based upon the real cost of recycling, the risk with this approach is that producers could contribute more than the full net cost overall of packaging placed on the market – which the consultation document recognises.

■ Although the deposit and fee is attractive, because it is more likely than a modulated fee to stimulate a circular economy approach; on balance we support the modulated fee.

**16 Do you think there could be any unintended consequences in terms of packaging design and use arising from:**

**Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Modulated fees:**

Yes

**Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Deposit (for recyclable packaging) and fee (for non-recyclable packaging):**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Both modulated fees and a deposit/fee approach are expected to encourage producers to substitute less easily recycled material for more easily recycled material in their product packaging. However, the provision of materials and recycling facilities varies across the country. So, one unintended consequence as the result of the substitution of one material for another could be that the average transport distances could increase for both transporting materials for packaging manufacture and at the end of life to packaging recycling facilities.

In addition, we support the CIWM draft response to this question:

If the modulated fee approach is used, the fee structure should be devised in such a way to avoid a cliff edge when a target is met – i.e. that it continues to incentivise the good packaging design and recyclability beyond the achievement of the recycling targets.

Whichever approach is adopted, it will have to be based on or aligned to the 'approved list' of recyclable packaging, the development of which will require full supply chain consultation and will need to be based on robust life cycle analysis to reduce the risk of unintended consequences such as material substitution that increases overall environmental impact.

**17 Do you agree that the deposit approach should be designed to incentivise more closed loop recycling?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

In Belfast, under our Waste Framework Strategy, we have heavily invested in a system that produces quality materials to support a Circular Economy Model. We would therefore support measures and approaches designed to incentivise more closed loop recycling.

We are also supportive of the arc21 response to this question:

A fiscal signal to include easily recyclable material, whether that be a deposit/fee or a modulated fee, raises awareness of the need to design in recyclability from

the outset and the deposit approach also provides the opportunity to incentivise closed loop recycling.

We are also supportive of the CIWM draft comments that the stimulation of a more closed-loop recycling approach would require:

a clear definition of closed-loop recycling

- a detailed life cycle analysis for each material
- a detailed understanding of the market capacity for closed-loop recycling, given that it will not be appropriate/achievable for some packaging materials and formats, and the impact on current open-loop recycling markets.

### **Part A: 3. Obligated producers**

#### **18 What do you consider to be the most appropriate approach to a single point of compliance, the Brand-owner or the Seller approach?**

Brand-owner

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

The current system of shared responsibility across the packaging chain has worked well since its introduction, but we note that this creates the potential for four separate organisations to be obligated for one unit of packaging – the material manufacturer, the converter, packer-filler and seller. We also recognise the risk of the price signal being diluted by having a shared responsibility approach. As a result, we support reform to a single point of compliance.

■ We support compliance at the brand-owner level on the basis that the brand owners are the ones putting the product forward to the market but have no further evidence to support this view. Brand owners and sellers are best placed to answer this question.

#### **19 If a single point of compliance approach was adopted, do you think the de-minimis should be:**

Replaced with a lower turnover threshold?

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Replacing the de-minimis with a lower turnover threshold still retains the principle of producers being obligated under producer responsibility legislation, albeit that very small and micro-businesses would be exempt such as an independent café that fills takeaway boxes at the point of purchase.

■ A move to retain the de-minimis threshold and obligate wholesalers and direct-to-retail sellers of unfilled packaging seems to undermine the principle of producer responsibility – because the wholesalers and direct-to-retail sellers would have to pay the fees on the unfilled packaging products that they sell to producers (albeit that the prices they would charge would be inclusive of EPR obligations).

■ Whilst we note the littering impact of packaging placed on the market by takeaway businesses our view is that it is better to introduce the new system first as proposed with a lower threshold and then review it at a later date if it becomes clear that the exemption of very small businesses is causing a problem.

#### **20 Should small cafés and restaurants selling takeaway food and drinks whose packaging is disposed ‘on the go’ be exempt from being obligated?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Small cafés, restaurants, fish and chip shops and other takeaway outlets produce packaging waste which is commonly littered. Whilst drinks containers are likely to be covered by a DRS, other items e.g. food takeaway boxes, will not be. Making these businesses obligated under EPR would encourage them to produce less, and/or more reusable, packaging.

#### **21 If shared responsibility is retained, is Option A or Option B preferable for including smaller businesses or the packaging they handle in the system?**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We do not think shared responsibility should be retained so have not answered this question.

#### **22 If you have stated a preference for A, do you think the de-minimis threshold should:**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We have no meaningful information that would enable us to provide a response.

#### **23 Overall, do you have a preference for maintaining a shared responsibility compliance approach, or moving to a single point of compliance?**

Single point of compliance

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc 21 response to this question - i.e. please see our response to Q18.

**24 Do you have a preference for how small businesses could comply?**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc 21 response to this question:

We have no meaningful information that would enable us to provide a response.

**25 Do you think that requiring operators of online marketplaces to take the legal responsibility for the packaging on products for which they facilitate the import would be effective in capturing more of the packaging that is brought into the UK through e-commerce sales?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Operators of online marketplaces should, as a matter of principle be sharing some of the producer responsibility burden associated with the packaging for which they facilitate the import and then pass into UK consumers' homes and waste.

■ These are digital businesses so the ease of compliance should be high and the costs of ensuring accurate reporting relatively low. However, incorporating these businesses into the EPR framework is inevitably likely to result in some self-reporting.

Given that more and more people now buy on-line it seem perverse to exempt these businesses from the overall regime.

**Part A: 4. Supporting improved collections and infrastructure**

**26 Do you agree that payments to local authorities for collecting and managing household packaging waste should be based on:**

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - provision of collection services that meet any minimum standard requirements (by nation):**

Yes

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - quantity and quality of target packaging materials collected for recycling:**

Yes

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - cost of managing household packaging waste in residual waste:**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Yes, we agree that the payments to councils for collecting and managing household packaging waste should be based on all of the above measures.

■ A long-standing complaint of producers and retailers has been the varying collection systems provided by councils across the country and that as a result communication about recycling on a national scale is more difficult. Collection services which meet minimum standard requirements set by each nation would help to address this and ensure that the efficacy of communications is maximised.

■ We note that the consultation states that if additional packaging items, such as film plastic waste produced by households (which is mostly LDPE) and compostable plastic packaging, were to be required to be collected from households in the future then producers would be expected to cover these costs. However, in some cases these items are collected and recycled already. We would recommend that the system is sufficiently flexible to allow for the costs of other materials than those which are mandated should be able to be recovered too if they contribute to the producers' targets.

■ Payments which are sensitive to the cost of managing household packaging waste in the residual stream is sensible.

■ However, we are concerned that the reference costs which will be used for making payments will properly reflect the situation throughout Northern Ireland.

**27 Do you think we have considered all of the costs to local authorities of managing packaging waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

In Belfast, we are considering significant capital costs as a council to support our new household collection systems. We would stress that costs should be a true reflection of full costs, including haulage, operations and logistics.

We would be in support of the arc21 response to this question:

The consultation document notes that producers should not be expected to cover the costs of inefficient service delivery and their financial contribution should not exceed the costs necessary to provide those services (Section 1). However, we are concerned that the detail is not provided to understand how the efficiency of a collection service will be assessed and whether, if some costs have been excluded, a service may be erroneously judged as being inefficient.

■ The need to provide consistent collections, including the additional separation of materials, is likely to require additional bulking bays for separate materials at transfer facilities. It is unclear if the full costs of additional bulking bays at transfer facilities have been incorporated.

■ Thirdly we are unsure if collection depot running costs have been included.

■ A key piece of work is to understand how much the costs of managing packaging waste vary between councils We are also concerned that the payments for packaging waste in residual waste which will be based on the average disposal gate fee for household waste for landfill or incineration, using either national average rates or regional average rates have sufficient granularity. If residual waste is transported to a region with very different disposal costs it is important that this is reflected in the payments so that the producing local authority is properly recompensed.

There is also a lack of clarity about items recycled from residual waste such as in an MBT plant.

Also, as mentioned in the response to Q.10a, we are concerned that the following costs might be missed:

- the costs of making household waste and recycling centres (we would also add in bring banks) available to the public for receiving packaging waste
- well the costs of clean-up of littered and fly-tipped packaging
- the costs of collecting packaging that is within the residual waste stream as well as the packaging within the dry recycling stream
- the costs of analyses to determine the quantities of packaging materials within the residual waste streams

**28 Do you agree with our approach to making payments for the collection of household-like packaging waste for recycling?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We support the principle of payments for the collection of household-like packaging waste for recycling being similar to those for household waste, namely a formula which takes into account the cost of collection, proportion of target recyclable packaging materials in the waste stream and weight of target materials recovered for recycling. However, our comments regarding omissions as set out in response to question 27 also apply to household-like packaging waste collected from businesses.

**29 Should businesses producing household-like packaging receive a payment for the costs of household-like packaging waste in residual waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view:**

We support the arc21 response to this question:

There should already be an incentive for businesses to recycle because they pay for the costs of their waste service, so a payment should not be needed. However, if it would help to capture more of the material then it perhaps could be considered at a later date.

**30 Are there other factors, including unintended consequences that should be considered in determining payments to:**

**Local authorities? Please explain the reasons for your response and provide any information to support your view:**

We support the arc21 response to this question:

There will be a period of transition as the new EPR system is implemented. Two options are provided for in the consultation document regarding the ownership of packaging waste recovered for recycling which need to be factored into considerations regarding payments to councils. If ownership of material is retained by producers then councils could be paid their gross costs and hence would no longer bear the risk of fluctuating material prices. Or, as now, councils could continue to receive income for the sale of their recyclable packaging materials and this income would need to be taken account in payments made to councils as producers are required to pay net costs. During the transition period between the current and new regime and depending on which option above is considered there may be a need to consider operating both systems side by side. Transitional arrangements should be taken into consideration.

**For the collection and recycling of household-like packaging waste? Please explain the reasons for your response and provide any information to support your view:**

We support the arc21 response to this question:

None to note.

**31 Do you have any information that would help us to establish the costs incurred by local authorities and other organisations of cleaning up littered and fly-tipped packaging items?**

**Please provide any information below:**

We would signpost you to "Keep Northern Ireland Beautiful"

(<https://www.keepnorthernirelandbeautiful.org/cgi-bin/greeting?instanceID=1>)

- an environmental charity dedicated to making Northern Ireland a cleaner and more pleasant place in which to live. KNIB may have data available that could help with this.

**32 How do you think producer fees could be used to improve the management of packaging waste generated on-the-go?**

**Please answer below:**

We would be in support of a number of responses to this question:

arc21 response:

One option may be for councils to receive an additional payment if their on-the-go recycling system is identical to the minimum standard (dry materials) for kerbside services. This could be introduced at a later date but it would be necessary not to disadvantage smaller rural authorities with limited on-the-go provision.

■ Another option would be to ensure that communications provision included on-the-go so that there would be an incentive for councils to make their on-the-go provision consistent with their kerbside service.

CIWM draft response:

By funding improved and adequately resourced on-the-go collection provision and anti-litter communication campaigns.

LARAC response:

As outlined in the consultation document the infrastructure for on the go recycling could be improved and so this is an area where producer fees could contribute. However, from our experience, on the go recycling bins are very poorly used and the public do not use the correct bins for the correct materials, and so the bins end up contaminated with the wrong recycling materials and non-recyclable materials. Therefore, there is a massive public awareness and campaign that needs to be undertaken if we are going to see the behaviour change needed to make a comprehensive on the go recycling infrastructure viable.

**33 Do you have any information that would help us to establish the costs of collection and disposal of increased on-the-go provision?**

**Please answer below:**

We support the arc21 response to this question:

As on-the-go material is mixed with household kerbside collected waste for disposal, we do not have separate costs available.

We can add however, that Belfast City Council operated on the go recycling since 2002 but as a stand alone the costs proved prohibitive and the service was redesigned to include other collection systems (such as litter bins).

We would signpost you to RECOUP <http://www.recoup.org/> as they might have some research data available that perhaps help with this.

**34 Do you agree that provision for the take back of single-use disposable cups for recycling should continue to be developed a voluntary basis by business prior to a government decision on whether disposable cups are included under an EPR scheme or DRS?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view:**

We support the arc21 response to this:

Given the volume of single use disposable cups being used and thrown away and the voluntary measures already in place the Government should take a short amount of time to review the evidence on the effectiveness of these schemes and then implement a mandatory regime.

In addition, we would add that Belfast City Council's experience is that Member interest in this area is developing fast and the council has recently cut its usage of single use cups (in-house) by a significant amount.

**35 Do you think the recycling of single-use disposable cups would be better managed through a DRS or EPR scheme?**

Both

**Please briefly state the reasons for your response and provide any information to support your view:**

We support the arc21 response to this question:

EPR would encourage producers to shift away from single-use and/or a move to more easily recyclable single use cups.

o DRS would encourage consumers to return their disposable cups for recycling or reuse

o DRS could be a good way to incentivise reuse, rather than just return for recycling.

**36 Do you think a recycling target should be set for single-use disposable cups?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

Yes but in agreement with the arc21 response, it would be preferable to incentivise refillable / reusable cups rather than recycling.

We would also support CIWM comments that:

The roll out of EPR approaches to other waste streams, in this case a subset of packaging but a discreet waste stream nonetheless, will require targets to be set.

**Part A: 5. Helping consumers do the right thing – communications and labelling**

**37 Should producer fees be used to support local service related communications delivered by local authorities?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

We support the use of producer fees for local service-related communications, but this support could be on the proviso that suitably flexible national branding is used and that the money is ring-fenced for communications.

■ Local communications can be targeted and customised and are a vital part of the communications mix, reducing the 'bystander bias' of national activity.

Examples from other sectors to support the need for local communications including the National Blood Transfusion Service which became far more effective at gaining blood donors when it changed its communications from national messaging about giving blood, to a more localised approach saying that the local hospital was running low on supplies. Spotify has also localised its communications to attract more users.

■ Local communications will also be particularly important in the transition period before consistency of collections is in place across each nation.

**38 Should producer fees be used to support nationally-led communications campaigns in each nation?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

We suggest that it is appropriate for funding to be used for national branding, research and communications materials but not for communications campaign delivery until consistent collections are in place.

**39 Are there any circumstances where producers should be exempt from contributing to the cost of communications campaigns?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

We cannot think of any reasons for exemption

**40 Do you agree it should be mandatory for producers to label their packaging as Recyclable/Not Recyclable?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

Because as noted in our response to question 6 consumers are often confused about what to do when they come to dispose of a product and its packaging which leads to less effective recycling and higher levels of recycling contamination than we want.

In addition, we support the LARAC response to this question:

LARAC supports the mandated use of labelling indicating if packaging is recyclable or not. LARAC would also want to see other "recycling labels" removed from packaging as these are often misleading and meaningless from a consumer recycling advice point of view.

Current recycling labelling which states 'check locally' is not helpful for residents. Labelling needs to be clear and unambiguous. The recyclability of packaging should therefore be linked to the core consistency materials identified for collection at kerbside.

LARAC believes that OPRL should be taken forward as the mandatory label for recycling in the UK. It is already well recognised by consumers, has built up a wealth of consumer insight and knowledge and is widely backed and used by the retail and packaging industry already.

**41 Do you think that the percentage of recycled content should be stated on product packaging?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view:**

We support the arc21 response to this question:

Because labelling about the recycled content of the packaging would reinforce consumer messaging about the outcome of recycling, i.e. that the material consumers recycle gets made into new products.

**42 If you responded yes to the previous question, how could recycled content information be provided to consumers?**

**Please describe briefly.:**

We support the arc21 response to this question:

The labelling could be colour coded like energy efficiency ratings.

**43 Do you have any other proposals for a labelling system?**

**Please describe briefly.:**

No

**44 Do you have experience to suggest an appropriate lead-in time for businesses to incorporate any mandatory labelling requirements?**

**Please describe briefly.:**

We support the arc21 response to this question:

We have no meaningful information that would enable us to provide a response.

**Part B: 6. Packaging waste recycling targets to 2030**

**45 In your view, are the estimates made in the Material Flow reports for packaging waste arisings the best available data?**

I don't know / I don't have enough information

**Please briefly state the reasons for your responses and provide any information to support your view.:**

**46 Are you aware of any other factors which may affect the estimates of packaging waste entering the waste stream?**

No

**Please briefly state the reasons for your responses and provide any information to support your view.:**

**47 In your view, are there other factors which may affect the amounts of obligated tonnage reported?**

I don't know / I don't have enough information

**Please briefly state the reasons for your responses and provide any information to support your view.:**

**48 Do you agree with the packaging waste recycling targets proposed for 2025?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view:**

Yes -we agree

**49 Do you agree with the packaging waste recycling targets proposed for 2030?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view:**

Yes - we agree

**50 Please provide your views on the policies and actions that could help us achieve an even higher overall packaging recycling rate, for example 75%, as well as your views on the costs associated with doing so.**

**Please answer below:**

Belfast City Council would be keen to explore Pay as you Throw initiatives, such as incentivised systems, in order to overcome public inertia to drive beyond our targets.

**51 Do you foresee any issues with obtaining and managing nation specific data?**

I don't know / I don't have enough information

**Please briefly state the reasons for your responses and provide any information to support your view.:**

**52 Should a proportion of each material target be met by “closed loop” recycling, e.g. as is the case for glass recycling targets?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view.:**

We support the arc21 response to this question:

As we seek to transition to a more circular economy it would be helpful if the producer responsibility packaging waste regulations could assist us to do so.

In addition, we are also in support of CIWM draft comments on this question:

If the stimulation of more closed-loop recycling is a desired outcome, it will require:

- a clear definition of closed-loop recycling
- a detailed life cycle analysis for each material
- a detailed understanding of the market capacity for closed-loop recycling, given that it will not be appropriate/achievable for some packaging materials and formats, and the impact on current open-loop recycling markets.

**53 Should government set specific targets for individual formats of composite packaging?**

Yes

**If yes, what key categories of composite packaging should be considered?:**

We support the arc21 response to this question:

We do not have sufficient knowledge and detailed information of the packaging sector that would enable us to provide a response. However, we do support the principle of setting targets for composite packaging recycling.

We also support the LARAC response to this question:

LARAC believes that setting targets for individual formats will significantly improve sorting and recycling infrastructure for these products that are currently not easy for local authorities to find end markets for from kerbside collected material.

Packaging such as gel pouches, crisp packets and tetrapak type packaging should be considered for individual targets.

**54 Do you agree with the proposed interim targets for 2021 and 2022 set out in Table 6?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view.:**

We support the arc21 response to this question:

The targets proposed take account of current performance and the required trajectory, so seem reasonable, although it is unclear if any implications of Brexit have been incorporated.

**55 Do you agree with the proposal to increase the allocation method percentage to 35% for 2021 and 2022?**

I neither agree nor disagree

**Please briefly state the reasons for your responses and provide any information to support your view.:**

We agree with the arc21 response to this question:

We are not aware of any conclusive evidence that would enable us to provide a response.



## Part C: 7. Governance Models

### 56 Overall, which governance model for packaging EPR do you prefer?

Model 2

#### Please briefly explain your preference.:

We support the arc21 response to this question:

Many other countries operate a single governance model – so it is a well-established approach for packaging compliance and the costs and operating model are known.

- A single governance model simplifies the current regime of competing compliance schemes which has delivered compliance and at a low cost but which has led to a fragmented approach where the whole scheme costs and investment back into recycling collection services is not as transparent as we would wish.
- Model 2 is underpinned by modulated fees which we believe will be the best approach for changing producers' choices towards the use of easy-to-recycle packaging.

### 57 If you had to modify any of the models in any way to make them better suited to achieve the principles and outcomes government has set for packaging EPR what changes would you suggest?

#### Please describe briefly.:

We support the arc21 response to this question:

Model 1: Enhanced near-to-business as usual - compliance schemes.

- Due to the competitive nature of the market under this model, schemes would compete for local authority services as with the WEEE compliance approach now. In order to provide a comprehensive service, it would be necessary to include a mechanism to prevent the most costly-to-collect-from councils from being without a compliance scheme provider into which all schemes would have to contribute.
- This model requires the transfer of a proportion of funds to an independent board which would run communications campaigns on behalf of the schemes. In order to ensure that this worked well it would probably be necessary to establish a governance structure whereby one of the compliance schemes took the legal lead. Prior to the establishment of WRAP the National Waste Awareness Initiative as it was then known, (now Recycle Now) was run by a board. However, because there was a need to let contracts to communications agencies, research agencies etc. that board then had to become a legal entity in order effectively deliver the campaign. A quicker approach is to let one of the member organisations take the lead.
- The complexity of each compliance scheme working alongside the DRS would possibly also require a combined management body to ensure a coherent system was created.
- Model 2: Single not-for-profit producer management organisation.
- Model 3: Separate schemes for household/household-like packaging and commercial/industrial packaging.
- Data collection management would be one of the most difficult aspects of this model, because with different schemes responsible for household/household-like packaging and commercial/industrial packaging no-one organisation would have a complete picture of the progress towards recycling target achievement. A data sharing arrangement would be required with one of the schemes taking the lead for providing information to government.
- Communications funding for reducing littering would also need to be co-ordinated between the schemes because communications to reduce littering does not necessarily need to distinguish between the sources of the litter or if it does communications require co-ordination.
- Model 4: Deposit-based government managed system.
- The consultation document notes that the Government has not found a similar scheme operating elsewhere so it could include a number of unknown costs and risks.

### 58 Do you have any concerns about the feasibility of implementing any of the proposed governance models?

Yes

#### If yes, please provide specific reasons and supporting information for each governance models that you have concerns about:

We support the arc21 response to this question:

All of the models are feasible, but some as indicated above would require more time and complex structural arrangements to put be put in place in order to make them effective.

### 59 Do you think that any of the governance models better enable a UK-wide approach to packaging producer responsibility to be maintained whilst respecting devolved responsibilities?

#### Please describe briefly.:

We support the arc21 response to this question:

Yes – Model 2, because there could be single not-for-profit management organisations within each nation.

### 60 Stakeholders have suggested that a compliance fee mechanism similar to the arrangements currently in place under the WEEE producer responsibility scheme should be introduced if a competitive evidence market continues to operate such as in Model 1. Do you agree?

Yes

#### Please briefly state the reasons for your response and provide any information to support your view.:

We support the arc21 response to this question:

Firstly because of the requirement to provide support for authorities who have not been able to award a contract to a compliance scheme for whatever reason. The compliance fee can be set to ensure that each scheme pays into a fund which can support the provision of services to such councils.

- Secondly because it would potentially be able to fund comprehensive communications

**61 Should a Packaging Advisory Board be established to oversee the functioning of the EPR system and the compliance schemes in the competitive compliance scheme model 1 or do you think other arrangements should be put in place?**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We are unsure about the alternatives so cannot comment upon this question.

**62 Please let us know your thoughts as to whether the proposed single management organisation should be established on a not-for-profit basis or as a government Arm's Length Organisation.**

**Please answer below:**

We support the arc21 response to this question:

There are pros and cons of each approach but on balance we recommend a non-for-profit basis

**63 If such a management organisation is established as not-for-profit, one option is for government to invite proposals from potential operators and then issue a licence to operate for a defined period of time. Do you agree with this approach?**

Yes

**If no, would you like to suggest an alternative approach?:**

**64 Should a single scheme be established for household/household-like packaging and C&I packaging as described for model 2?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

**65 Or, should there be a separate system for managing compliance for household/household-like packaging and C&I packaging as described for model 3?**

No

**If yes: could model 3 work as described? Or would additional mechanisms be required to make this approach work effectively? Please indicate what these might be.:**

**If no: do you have suggestions for an alternative approach?:**

We support the arc21 response to this question:

This may be better addressed by others who are closer to the detail of how compliance can operate.

**66 Under model 4 are producers more likely to:**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We have no meaningful information that would enable us to respond.

## **Part C: 8. Responsible management of packaging waste domestically and globally**

**67 Do you agree that government should seek to ensure export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

arc21 are hopeful the introduction of these measures will help to improve the economic climate and proportionately more of the packaging waste will be recycled locally. However even with local developments in infrastructure the option to export will continue to exist. Ensuring appropriate standards and transparency will be important to ensure competitive fairness and assist with public perceptions.

**68 Do you agree that measures identified here would help ensure the export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

arc21 broadly agrees that the measure identified could assist in improving the system regarding the export of packaging waste. However, the system will only

ever be as good as the regulation of it and if changes are to be made, they must be backed up with appropriate resources for the regulators to undertake the actions they need to maintain the system in the desired manner. The measures proposed need to include this in their design and ensure that adequate funds are generated to undertake appropriate regulatory activities in relation to the export of packaging waste.

**69 Have we missed potential measures that you believe need to be considered alongside those measures we have proposed?**

No

**If yes, please explain which potential measures should be considered.:**

**70 Do you have any concerns about the feasibility and / or costs of implementing any of the proposed measures?**

Yes

**If yes, please provide specific reasons and supporting information for each measure that you have concerns about:**

We support the arc21 response to this question;

The transition period will be complex as producers and councils move to the new system, consistent collections come into force and a DRS is implemented, assuming that all three new measures are implemented. Coupled with any complexities introduced as a result of Brexit, this could lead to unforeseen delays and costs.

**Part C: 9. A more transparent system**

**71 Do you agree that accredited reprocessors and exporters should be required to report their financial information?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view. If you answered no, how would you suggest transparency is provided on how income from the sale of evidence has been used to support capacity building?:**

We support both the arc21 and LARAC responses to this question:

arc21:

A requirement to report financial information will provide confirmation to show how the income from the sale of evidence has been used to support capacity building, thereby supporting the transparency principle number 8 of the governance principles behind the reform to the packaging regime.

LARAC:

If any form of PRN is retained in the new EPR system there might be a suspicion that the system has not been truly reformed.

LARAC is uncertain how requiring reporting of financial information in the manner proposed will lead to better transparency than currently. As a concept it could well do so, but the provision of fully audited financial accounts is too high level and vague. More detail is needed on what types of financial information will be requested, relating to what and reported to what level of detail. In theory there are requirements under the PRN system to report spend in certain areas, but this has not helped transparency of the system. Much more detail and assurances need to be given by Governments on proposals in this area to allay fears from local authorities that this is true producer responsibility reform and that transparency on funds will change in such a way that we have confidence that they are being spent on true system change to increase recycling.

LARAC is in favour of much more detailed reporting (and suitable auditing of) detailed information on spending of funds on infrastructure and collection of packaging waste.

**72 Should accredited reprocessors and exporters be required to generate evidence for every tonne of packaging waste that they process?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

arc21 believes that evidence for every tonne of packaging waste should be generated where this is of relevance to the governance model that has been chosen. We believes there is merit in keeping market trading to a minimum within the new system to then mitigate against some of the issues that have caused problems with the PRN system.

**73 Should accredited reprocessors and exporters be required to report on the packaging waste they handle monthly?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

**74 Do you think that any additional measures to those already described would be required to ensure transparent operating of the evidence market in model 4?**

Yes

**If yes, please provide details:**

We support the arc21 response to this question:

The risk with this model is that schemes pay more than they need at the start of the year. Accurate estimates would be required, particularly for small businesses where paying the fee up-front could cause unnecessary cash-flow difficulties.

**75 Are there any additional requirements that should be placed on compliance schemes to ensure greater transparency of their operations and reporting?**

No

**If Yes, please briefly state the reasons for your response and provide any information to support your view.:**

**76 Under a reformed system do you think compliance schemes should continue to be approved by the existing regulators or do you think a different approach is required?**

Yes, approved as now

**Please explain below:**

**77 Are there any additional requirements of a single producer organisation to ensure transparency of its operation and reporting?**

Yes

**If yes, please briefly state the reasons for your response and provide any information to support your view.:**

We support the LARAC response to this question:

There is a lot more detail to be developed in this area. The high-level actions outlined in the consultation are a starting point but there needs to be further discussion across the industry as to how the single organisation is managed and monitored.

An annual action plan may be more relevant in this instance than others, but it should be short and punchy and focused on the key areas of activity. The annual reporting should also focus on a set of key indicators and performance targets set with input from all stakeholders, including local authorities. These could be reported on a more frequent basis, quarterly for example. That said the monitoring needs to be robust and meaningful but not become a burden on the single organisation and draw funds away needlessly from the actual task in hand of recycling packaging waste.

**78 Do you think there is a need to make more information on packaging available to consumers?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

We support the arc21 response to this question:

We understand there is a perception of confusion about the recyclability of packaging and whether recycling information on packaging refers to the product or the packaging. In particular, we also find that residents want information about why if you take two different products made of the same material, one may be recyclable and the other not. A single link to a helpline and a website containing comprehensive packaging recycling information may suffice.

## **Part C: 10. Compliance monitoring and enforcement**

**79 Are there other datasets that will be required in order to monitor producers in any of the proposed models?**

Not Answered

**If yes please explain which datasets will be needed:**

Don't know

**80 Is there a specific material, packaging type or industry sector whereby producing accurate data is an issue?**

Not Answered

**If yes, please provide further information on where producing accurate data may be an issue. :**

Don't know

**81 Do you think a single database, as opposed to the current range of methodologies available, would be an effective alternative?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

Consistency

**82 Do you agree that compliance schemes (models 1 and 3), the producer management organisation (model 2) or the scheme administrator (model 4) should be responsible for carrying out audits of producers, which should be reportable to the regulators?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

This should be done in accordance with Duty of Care Legislation.

We are also supportive of the LARAC response to this question:

For model 1 and model 3 LARAC has concerns about compliance schemes undertaking audits on companies who are their members as there is an obvious potential for a conflict of interest. Given compliance schemes compete for members there could be a situation where one scheme undertakes an audit that the

member believes is unfair and so the member moves to another compliance scheme. LARAC does not want to see an unwieldy system that introduces potential inefficiencies, but we believe there should be a process by which a proportion of the audits undertaken by compliance schemes are reviewed by the regulator for quality purposes. This will give all stakeholders reassurance that the system is robust and reduce the possibility of disputes across compliance schemes about how they approach this aspect of their activities and any accusations of trying to gain market advantage through less than full audit processes.

**83 Do you support the broadening of legally enforceable notices to obtain required information?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

**84 Are there other enforcement mechanisms that should be considered which would be timely and effective to bring producers into compliance, for example in relation to free riders?**

Not Answered

**If yes, please explain which other enforcement mechanisms should be considered:**

Unsure

**85 Are there any further data that should be required to be collated / collected via compliance schemes or a single management organisation?**

**Please provide brief details.:**

We are supportive of the arc21 response to this question:

It would be helpful to link the data sets in a reformed EPR with the number and type of complaints received through the packaging essential requirements regulations. In theory with a better EPR scheme and improved design for recyclability there should be fewer complaints about packaging design, but it would be interesting and useful to capture this information.

**86 Do you think a penalty charge, as described, is the correct lever to ensure packaging recycling targets are met?**

I don't know

**Please briefly state the reasons for your response and provide any information to support your view.:**

**87 Should stakeholders other than reproprocessors or exporters be able to issue evidence of recycling?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

The e-docs system should be considered within this context and electronic tracking of evidence should be in line with a new improved e-docs system.

**88 Are there any additional enforcement powers that should be applied to waste sorters, MRFs and transfer stations handling packaging waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

**89 Do you agree with the proposed amendments to enforcement powers relating to reproprocessors and exporters?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

**90 Do you have any evidence to indicate that under any of the proposed governance models the likelihood of waste packaging being imported and claimed as UK packaging waste might increase?**

No

**If yes, please provide information on any evidence you have:**

**91 Is the current requirement for a sampling and inspection plan and subsequent auditing by the regulator sufficient to address any misclassification of imported packaging waste?**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

Unsure

**92 Are there other mechanisms that could be considered that would prevent imported UK packaging waste being claimed as UK packaging waste under the proposed governance models?**

Not Answered

If yes, please explain which other mechanisms could prevent imported packaging waste being claimed as UK packaging waste:

Unsure

## 11. Estimated costs and benefits

93 Do you have any additional data or information that will help us to further assess the costs and benefits (monetised or non-monetised) that these reforms will have?

Please answer below:

No

94 Do you have further comments on our impact assessment, including the evidence, data and assumptions used? Please be specific.

Please answer below:

No

## 12. Further comments

95 If you have any other views or evidence that you think we should be considering when reforming the packaging waste regulations, which you have not yet shared, please add them here.

Please answer below:

Not at this time

## Consultee Feedback on the Online Survey

96 Overall, how satisfied are you with our online consultation tool?

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.:

## Response ID ANON-JZGE-SNBG-T

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**  
Submitted on **2019-05-13 12:39:46**

### Introduction

#### 1 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason: :

#### 2 What is your name?

Name:

Brendan Murray

#### 3 What is your email address?

Email:

murrayb@belfastcity.gov.uk

#### 4 Please provide information about the organisation/business you represent

Which of the following best describes you?:

Local Authority

If you answered 'other' above, please provide details:

What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):

Belfast City Council

What is the approximate number of staff in your organisation? (if applicable):

3,000

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

Please answer below:

Belfast City Council is the largest local authority in Northern Ireland and is a unitary authority, responsible for both waste collection and disposal. The Council is a member of arc21, a regional waste management body in the eastern seaboard of Northern Ireland. The Council has contributed to the arc21 collective response to this consultation. We are supportive of the arc21 responses, however, where appropriate, we have also added additional, sometimes Belfast specific, comments

#### 6 Does your organisation have any recent experience of a DRS or related schemes? If so, can you please briefly explain your experiences?

Please answer below:

No

#### 7 Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?

Yes

### Background

#### Our approach

#### 8 Do you agree with the basic principles for a DRS?

Yes

Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view:

We support the arc21 response to this question:

"Yes, but the principle of 'full net cost recovery' (FNCR) should also be a key principle so that producers always have the full financial incentive to minimise the

impacts of their products post-use. A DRS established as part of a wider EPR regime ensures clear responsibility for end-of-use management of resources and should have a positive impact on wider public and consumer behaviour. We would also reiterate concern around the timing of its introduction and the reference to await the introduction of the Packaging Responsibility Reform before looking to introduce DRS."

In addition, the DRS should target the reduction of litter and the improvement of local environment as a basic principle.

## 9 Should the following materials be in scope of a DRS?

**Type of material included - PET bottles:**

Yes

**Type of material included - HDPE bottles:**

Yes

**Type of material included - Aluminium cans:**

Yes

**Type of material included - Steel cans:**

Yes

**Type of material included - Glass bottles:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

All materials already widely recyclable.

## 10 Should the following materials be in scope of a DRS?

**Materials in-scope - Cartons e.g. Tetrapacks:**

Yes

**Materials in-scope - Pouches and sachets e.g. energy gels:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Cartons - already widely recyclable and a foreseeable substitutes for the materials in Q9 to which producers might switch if outside the scope.

Pouches & sachets - A foreseeable substitute for the materials in Q9 to which producers might switch if outside the scope.

## 11 If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this Question:

" Incentives to refill should not be limited to glass. Waste prevention should be clearly treated as superior to recycling in the architecture of the DRS. In particular for water, schemes to promote water fountains and/or shops willing to top-up people's water bottles with tap water should be supported above recycling."

The Health & Safety implications of the use of glass bottles for refill would have to be considered before adopting such an approach.

## 12 Should the following drinks be in scope of a DRS?

**Should drinks be included? - Water:**

Yes (some)

**Should drinks be included? - Soft drinks (excluding juices):**

Yes (some)

**Should drinks be included? - Juices (fruit and vegetable):**

Yes (some)

**Should drinks be included? - Alcoholic drinks:**

Yes (some)



**Should drinks be included? - Milk containing drinks:**

Yes (some)

**Should drinks be included? - Plant based drinks (soya, rich almond and oat drinks):**

Yes (some)

**Should drinks be included? - Milk:**

Yes (some)

**Other (please state which)::**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Water

Yes - But with incentives and/or encouragement to reuse too, as all such bottles could be re-filled a number of times by the original consumer for his/her own use.

b. Soft drinks (excluding juices)

Yes.

c. Juices (fruit and vegetable)

Yes.

d. Alcoholic drinks

Yes (all) - We can see no rationale for exempting any types of alcoholic drinks.

e. Milk containing drinks

Yes.

f. Plant-based drinks (such as soya, rich almond and oat drinks)

We believe these should be treated the same as milk bottles. From the resources and waste management perspective, plant-based drink bottles should be in-scope, but this may require other mitigating measures from a public health perspective, particularly when considering those who cannot consume dairy products. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles and non-dairy equivalents are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure Full Net Cost Recovery (FNCR) of packaging of this material placed on the market.

g. Milk

From the resources and waste management perspective, milk bottles should be in-scope, but this may require other mitigating measures from a public health perspective. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure FNCR of packaging of this material placed on the market.

h. Other (please state which)

Yes - The principle should be that all drinks containers are in-scope unless explicitly designated as being not in-scope but should be covered within the EPR to ensure FNCR of packaging of this material placed on the market."

**13 Do you think disposable cups should be in scope of a DRS?**

**Should disposable cups be included? - Disposable cups made from paper with a plastic lining (used for coffee):**

Yes

**Should disposable cups be included? - Disposable cups made of plastic (used in vending machines):**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view. The Government is particularly interested in any evidence on whether or not it would be practical or cost effective to include disposable cups in the scope of a DRS.:**

We support the arc21 response to this question:

"a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups.

b. Disposable cups made of plastic (such as those used in vending machines)

Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups."

The total average spend on street cleansing across all of Northern Ireland in 2016/17

was £45,562,532. The introduction of a DRS for disposable cups will be a step in the right direction in tackling litter in society.

#### 14 Do you agree with the proposed material flows as described?

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"The role of councils and our waste handling routes is missing, yet we will be collecting these drinks containers in litter, recycling and residual waste. It is essential that the EPR consultation's commitment to 'full net cost recovery' is implemented fully if councils are not to receive the deposits, unless they act as 'vendor' or as a return point.

2) We suggest potential confusion may be avoided between DRS terminology and EPR/PRN terminology if the term "packer-filler" is used here rather than "producer".

#### 15 Do you agree with the proposed financial flows described?

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"No. - Unredeemed deposits should not be retained by the DMO or their value returned to producers in a way that creates a perverse incentive not to maximise deposit returns, which may well be the most expensive form of producers' compliance. In essence, the flows as set out could be viewed as seen as an obstacle to the aims of DRS and could affect public acceptance because the 'producers' will get their money back to fund the DRS and potentially make a profit.

Additionally, we would like to flag that the council role is missing from Figure 1 (p.25), but that it is not possible to determine how our role should be shown given that we do not know if/how the same drinks containers will be provided for in new EPR policies and structures. The key guiding principle however must be that of 'producer responsibility' such that through 'full net cost recovery' Councils are no longer paying for these wastes."

#### 16 Should producers obligated under a DRS be:

**Other (please explain):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?

No.

b. Also obligated under the reformed packaging producer responsibility system for the same packaging items?

No.

c. Other (please explain)

Yes - We believe any DRS should be fully integrated into a wider EPR scheme.

d. I don't know/I don't have enough information

N/A.

The possibility of creating loopholes and/or double-obligations appears too great in such a multi-faceted new regime, and the best way to avoid this risk would appear to have all such schemes run by a single body."

#### 17 If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"arc21 believes that all such schemes should be run by a single body to minimise both the double-charging risk and the possibility of creating compliance loopholes.

If the two schemes are not run by a single body the DMO will need to be fully linked to the EPR scheme, this could be done through shared representation across both schemes."

#### 18 Do you agree that the DMO should be responsible for meeting high collection targets set by Government?

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance. The targets should be published on a regular basis and set out responsibilities & accountabilities for meeting such targets."

**19 Should the DMO also be responsible for meeting high recycling targets set by government?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

No - Unredeemed deposits should not go back to Government. They should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles.:

"Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance.

However the ongoing statutory role for councils, both collection & disposal functions needs to be taken into account to prevent unintended consequences of different bodies "chasing target materials" such that the costs to society are not minimised."

It is important that there is a mechanism for the DMO to apportion tonnages collected via a DRS, to Local Authorities in NI who have a statutory obligation to report their recycling and waste statistics through the Waste Data Flow system. The DRS and the efforts of Councils must work in tandem for improved environmental outcomes rather than in competition.

**20 Should unredeemed deposits be used to part-fund the costs of the DRS system?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the views of arc21 and LARAC with regards to this question:

"No - Unredeemed deposits should not go back to the DMO in a way that then subsidises the cost of compliance to the DMO and producers. Rather they should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

"Most of the packaging from the unredeemed deposits will have ended up as litter or disposed/recycled through kerbside collections, bring banks or recycling centres, falling to local authorities to deal with. It would therefore be appropriate for the funds from unredeemed deposits to be directed towards local authorities to cover the costs of collecting this material. In accordance with Circular Economy principles, LARAC would also encourage some funding also to be directed towards enhancing local reprocessing facilities."

In addition these unredeemed deposits could be used to fund communications campaigns tackling litter.

**21 If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view :**

We support the arc21 response to this question:

"No - Unredeemed deposits should not go back to Government. They should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

**22 Do you have alternative suggestions for where unredeemed deposits could be allocated?**

**Please explain your answer:**

We support the arc21 response to this question:

"Yes - Unredeemed deposits should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

**23 If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:**

Industry (drinks producers)

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Industry (drinks producers)?

Yes.

b. Government?

Yes.

c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)?

Yes.

d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)?

Yes.

e. Other (please specify)

Yes - Councils, as we manage a large proportion of these items, and although we expect to manage a declining proportion, we will continue to have an interest from the litter and wider public health points of view.

Northern Ireland's public perception is that it is the councils which have a major and significant role to protect and be accountable for the local environment and amenity, and as such Northern Ireland council representation is key on this DMO."

## **24 Should there be government involvement in the set-up/running of the DMO body?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Yes – The Government must remain the primary body to ensure the EPR targets are met. The Government may discharge its delivery responsibilities through a DMO and its regulatory responsibilities through the Environment Agencies, but we cannot see how the Government will not be involved in the set-up/running of any DMO.

## **25 Do you agree with the government's proposals that a DMO would:**

**A DMO should: - Advise Government on setting of the deposit level/s:**

Yes

**A DMO should: - Set producer import fees:**

Yes

**A DMO should: - Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers:**

Yes

**A DMO should: - Set and distribute the handling fees for return points:**

Yes

**A DMO should: - Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?:**

Yes

**A DMO should: - Be responsible for maintenance of Reverse Vending Machines (RVMs) and provision of bags/containers to those running manual return points:**

Yes

**A DMO should: - Own the material returned by consumers:**

Yes

**A DMO should: - Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts:**

Yes

**A DMO should: - Fund counting sorting/centres – and manage the contracts for counting/sorting centres:**

Yes

**A DMO should: - Be legally responsible for meeting the high collection targets set by Government for drinks containers within scope of the DRS.:**

Yes

**A DMO should: - Measure and report recycling rates to Government:**

Yes

**A DMO should: - Run communications campaigns to aid consumer understanding of the DRS:**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

## **26 Do you agree with our proposed definition of a producer?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**27 Should there be a de-minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**28 Should a de-minimis be based on:**

**Should a de-minimis be based on: - Number of employees:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - Sales figures:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - Volume/ weight of drinks put on the market:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - None of these:**

I don't know/ I don't have enough information

**If yes, please provide more information (how many employees, what sales figure, what volume/ weight):**

**Other (please specify):**

**29 If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?**

**Please provide more information:**

No

**30 In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO? Do you agree with this proposal?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Yes - Full Net Cost Recovery is essential for the scheme to be accepted by Local Authorities and the public.

**31 Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMS and an IT system?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"Yes. – In relation to IT systems for drinks containers in Local Authority Controlled Waste, we would hope that the DMO would supply Councils with timely tonnage data such that we can include it in our submissions to WasteDataFlow in order to fully report on the overall recycling rate in our areas. "

**32 Should producers of drinks within a DRS be responsible for DRS operational costs?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the responses of arc21 and LARAC in this regard:

"Yes – This is an essential part of 'extended producer responsibility' and, as such, the costs cannot fall anywhere else without undermining EPR principles."

"Producers should be responsible for meeting the costs of the wider benefits such as communications campaigns and litter clearance in accordance with meeting full cost recovery. ..The intention of making producers responsible for these costs is that they will be more engaged in behaviour change activities at both national and local levels, as well as complying with the concept of full net cost recovery."

**33 Which of the following should be obligated to host a return point?**

Retailers who sell drinks containers in scope

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

For a DRS to be successful, it has to be as convenient as possible for consumers to return their used drinks containers and receive their deposit back.

Government may wish to consider a class of places which might be permitted (but not obliged) to host a return point. This could include those on the

non-obligated list above along with educational establishments, places of worship, parks, museums, galleries, sports clubs, conference centres, car parks, etc.

**34 What might the impacts be on those hosting:**

**(a) Reverse vending machines? Where available, please share evidence to support your view.:**

Parties directly affected would better address this but we would presume that space constraints and regulatory permissions may feature in responses.

In addition, if collecting glass there would be health & safety considerations.

Dependent upon the inherent value of the materials or the reward scheme, there may be security issues to consider in order to prevent theft. The units could become the new ATM and be a source of anti-community activity.

The DMO may wish to reflect the redemption process and how this shall be applied. In addition to simple financial credit it may also be appropriate to allow users to convert their pay-back to a virtual currency such as Colu, which is currently being explored by Belfast City Council. See link for further details; [www.colu.com](http://www.colu.com)

**(b) Manual return points? Where available, please share evidence to support your view.:**

Parties directly affected would better address this but we would presume that space constraints and regulatory permissions may feature in responses.

In addition, if collecting glass there would be health & safety considerations.

**35 Are there any Health and Safety-specific implications that may be associated with hosting return points?**

Yes

**Please provide more information:**

If glass is included within the scope of the scheme, there would be health & safety considerations.

With regard to milk containers see Q12.

**36 Is there a de minimis level under which businesses who sell drinks in scope should be exempt?:**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Parties directly affected would better address this.

**37 Should a de-minimis be based on:**

**Other (please specify):**

Parties directly affected would better address this.

**If yes, please provide more information (what floor size, what sales figure, how many employees):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**38 Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers?**

**Please provide details.:**

Parties directly affected would better address this.

**39 For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?**

**Please explain your answer:**

It may be appropriate for home delivery services to offer a take back service.

**40 What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?**

**Please explain your answer:**

The Council supports the LARAC response;

"Obligated producers, through the DMO (although not exclusively) would need to ensure that a suitable return provision is in place in rural areas. A different set of return points compared to urban areas could be considered, such as community halls and building and use of wider community groups to host return points.

Full net cost means exactly that and so there are some areas that will be more cost effective to set up with return points than others. Higher costs should not be an excuse for providing a less than appropriate or adequate system in rural areas. If an appropriate system is not provided then return rates will drop and littering rates will increase, leaving producers to pick up the cost via EPR which for litter is likely to be more expensive than getting clean material back through a DRS."

In addition, it may be appropriate for home delivery services to offer a take back service."

**41 Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?**

**Please explain your answer:**

The Council broadly supports LARACs response on this question:

"Local authorities that have provided on street recycling facilities will be able to provide evidence as to how well they are used. Generally, the public do not engage well with recycling on the go when there is no financial penalty not to. The potential for misuse, vandalism and theft would also be high and would need careful assessment and mitigation. A significant number of local authorities have removed bring banks due to high contamination levels and misuse.

The siting and design of any RVM that does not have an element of "help" or "administration" associated with their immediate use will need careful consideration and it could be that pilots are needed to establish the full consequences of such machines."

In addition, Belfast City Council has experienced significant contamination levels in its "on-the-go" recycling containers. There may be merit in locating the RVMs in supervised facilities.

**42 Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information.:**

We support the arc21 response to this question:

"Yes. – Otherwise the DRS would be a failure in the public's view and cause more confusion, effectively setting up a two-tier system from the start. It would also support accessibility to the DRS for those who may struggle to get to normal shops, and will likely improve the customer-service offering of these online retailers.

However, this should probably only apply to those using the distribution format most commonly associated with the "home delivery" model of online grocery shopping, i.e. staff make a delivery at a pre-allocated time when the resident is at home, using a trolley and crates that they then return empty to their bespoke truck. For drinks that are sold online but distributed through postal services, the provision of a take-back scheme would not be practicable. The containers would therefore have to be able to be returned via RVMs and other manual return centres."

**43 Should there be a de-minimis under which online retailers would not be obligated to pick up and refund DRS material?**

No

**Please provide more information:**

Belfast City Council does not have sufficient information to advise on this.

**44 If yes, should a de-minimis for online retailers be based on:**

**Other (please specify):**

Belfast City Council does not have sufficient information to advise on this.

**45 Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information. :**

Yes - Such businesses can either manage on site (as many already do for glass) or they should be contributing to a system aimed at reducing the impact on the environment of the products which they sell.

**46 Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information. :**

Yes - The primary aim of the scheme is to maximise the capture rate of such packaging and an opt-in system assists in this regard.

**47 Do you have any further views, comments or evidence in relation to retailers not already covered above?**

**Please provide more information:**

No

**48 How should a DRS account for 'on-trade' sites such as bars and restaurants?**

**Please provide more information:**

Drinks purchased in pubs, cafés etc. will be consumed on the premises and therefore it is unlikely that DRS will be required for such sites.

**49 What do you consider to be the optimum deposit level to incentivise return of drinks containers?**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the views of arc21 and LARAC regarding this question:

"The value needs to be sufficiently high that it can drive behaviour change, without having a significant adverse impact on the commercial viability of the product or disproportionately impact any social group."

"The level of the deposit should be set by the DMO, so that it can be varied in the light of experience. However, it is essential that any additional costs falling to Councils from bin-raiding by people seeking to claim the deposits from other people's discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of FNCR so that producers do indeed pay the full cost of managing their wastes. Consideration may also be given to include costs of damage to bins, litter from scavenging, street cleaning."

**50 Should the deposit level be a flat rate across all drinks containers covered by the DRS?**

Not Answered

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

See Q49

**51 Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

No. – Multi-packs are often used by families etc. for packed lunches, and as such should be included in all types of DRS and at the same deposit level.

**52 How do you think deposits should be redeemed? Please tick all that apply.**

Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop off), Digitally (e.g. a digital transfer to a smartphone application), Return to debit card, Option to donate deposit to charity

**Other (please state):**

Councils should be able to redeem drinks containers found in its street cleansing wastes and its recycling and residual waste collections.

In the past charities collected items such as milk bottle tops for fund-raising. We therefore suggest that the redemption regime should not prevent registered charities or other organised groups (e.g. schools) from collecting drinks containers and redeeming the deposits.

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Cash - holding cash within a RVM may encourage theft and vandalism.

Digitally - The DMO may wish to reflect the redemption process and how this shall be applied. In addition to simple financial credit it may also be appropriate to allow users to convert their pay-back to a virtual currency such as Colu, which is currently being explored by Belfast City Council. See link for further details; [www.colu.com](http://www.colu.com)

**53 Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Yes - The DMO will be a player within the waste management sector and as such should be required to comply with Duty of Care Regulations which include waste transfer notes and evidence of end destination.

**54 In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**55 How do you think transparent financial flows in a DRS could be achieved most effectively?**

**Please explain your answer, providing evidence where available:**

We support the arc21 response to this question:

"Regular publication of data /evidence setting out internal costs and payments to listed parties in line with public bodies."

**Monitoring and Enforcement**

**56 Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?**



Yes

If no, why and is there another body that would be better suited to perform this function?:

Please explain your answer:

**57 How frequently should the DMO be monitored? (This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))**

Not Answered

**Other (please specify):**

We support the arc21 response to this question:

"Assuming the Government will want Councils to include DRS data from their areas in WasteDataFlow (WDF) returns, arc21 believes the DMO should be monitored quarterly (at least for tonnages), with data published in good time for Councils to be able to include the performance in WDF."

**58 How often should producers be checked for compliance with the DRS (if compliance is obligated)?**

Not Answered

**Other (please specify):**

Monitoring needs to be appropriate and proportionate to the activity. The regulator must be able to check for compliance at any time outside of routine checks.

**59 Should enforcement focus on:**

All producers

**Other (please specify):**

**60 Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

The regulator would be best placed to consider what penalty levels are appropriate and these may reflect the size of operation.

**61 Are there any points in the system which you think would be particularly susceptible to fraud?**

**Please state :**

Belfast City Council would not have sufficient information to enable a meaningful response.

**62 Which labelling/markings on drinks containers in scope would best protect against fraud? Please select all that apply:**

Deposit value amount, Marking indicating inclusion in DRS, Existing product barcode (containing DRS information when scanned)

**Other (please specify):**

**Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems. :**

**63 How could return via Reverse Vending Machines (RVMs) best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions.:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**64 How could the process of manual returns best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions. :**

Belfast City Council would not have sufficient information to enable a meaningful response.

**65 How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?**

**Please explain your answer:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**DRS Options - 'all-in' and 'on-the-go'**

**66 Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?**

I don't know/ I don't have enough information

**Please state the reasons for your response. Where available, please share evidence to support your view:**

Excluding such containers from a DRS would appear reasonable so long as they are captured under other EPR provisions. Any such exclusions should be set in a statutory instrument so that they can be amended in light of experience.

**67 If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?**

Not Answered

**Other (please specify):**

**Please state the reasons for your response. Where available, please share evidence to support your view:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**68 Do you agree with our definition of 'on-the-go' as less than 750mls in size?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**69 Do you agree with our definition of 'on-the-go' as excluding multipack containers?**

No

**Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of 'on-the-go'. Where available, please share evidence to support your view:**

No - multi-packs may be used by families etc. for packed lunches or picnics etc. and as such should not be excluded from a DRS.

**70 Based on the information, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised in this consultation) which is your preferred DRS option?**

Not Answered

**Please state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 and LARAC response to this question:

"We have no definitive preference in terms of either option. However, on balance we feel there is merit in considering an incremental model of implementation. This may be in terms of pilot schemes and/or introducing 'on the go' initially followed by a period of evaluation to which unless it is unfavourable moving to an 'all-in' scheme."

"LARAC believes that DRS should be considered as a second phase after EPR reforms and should only be implemented if measures through EPR do not achieve the desired recycling levels."

## Summary of approach to Impact Assessment

**71 Do you agree with our impact assessment?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"No. – The funding model is a key piece of data and the current assumptions are vague and where they are stated to "un-monetised" they have never the less been given large social value in the model. In addition there may be differences in the supply chain arrangements and cost base in Northern Ireland which may impact on the assessment."

**72 Do you think more data is needed?**

Yes

**If yes, please state where:**

We support the LARAC response to this question:

"LARAC would urge the estimated return rate to be reassessed. If comparisons with other countries are to be made, it should be only against those countries which offer similar recycling opportunities for the proposed DRS materials. If no direct comparisons can be made further trials should be completed to provide assurance the required capture rate can be achieved to ensure the scheme does not operate at a loss."

In addition, there may be differences in the supply chain arrangements and cost base in Northern Ireland which may impact on the assessment.

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**73 Are there other costs and benefits which we have not covered in our impact assessment?**

No

If yes, please provide further information:

**74 Do you have further comments on our impact assessment?**

Please be specific.:

No

**75 The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives?**

If so please briefly describe it, making reference to any available evidence:

The Council believes that it may be appropriate to defer the introduction of a DRS in order to assess if other, more economical EPR measures are sufficient to achieve the objectives of the scheme i.e. increased recycling and reduced litter.

This is particularly the case given the economic costs of introducing such a system.

**76 A potential option for introducing a DRS could be to start with the 'on-the-go' model, and then expand/phase roll-out to 'all-in'. Do you think this would be an effective way to introduce a DRS?**

Not Answered

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

As stated in Q75 it would be preferable to defer the introduction of a DRS until the impacts of an EPR scheme can be fully measured. Should the objectives of the EPR not deliver on increased recycling and reduced litter and a decision is taken to introduce DRS it would seem sensible to have a graduated approach i.e. on-the go first and assess the impact before consideration is given to introducing an "all-in" scheme.

**Outcomes of what we are hoping to achieve**

**77 Do you think a DRS would help us to achieve these outcomes?**

**Do you think a DRS will help achieve these outcomes? - Reduction in litter and litter disamenity (include expected % decrease where possible):**

I don't know/ I don't have enough information

**Do you think a DRS will help achieve these outcomes? - More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go':**

Yes

**Do you think a DRS will help achieve these outcomes? - Higher quality recycling:**

Yes

**Do you think a DRS will help achieve these outcomes? - Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials:**

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

WE support the arc21 response to this question:

a. Reduction in litter and litter disamenity (include expected % decrease where possible)

We don't know, but it is essential that any additional costs/impacts falling to Councils from the disamenity of bin-raiding by people seeking to claim the deposits from other people's discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of 'full net cost recovery' (FNCR) so that producers do indeed pay the full cost of managing their wastes.

In calculating FNCR for Councils, producers should be required to make a reasonable contribution to street cleansing costs, perhaps by reference to the volume of their wastes in litter bins.

b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'

Yes in the absence of tangible evidence to the contrary

c. Higher quality recycling

Yes in the absence of tangible evidence to the contrary.

d. Greater domestic reprocessing capacity through providing a stable and high- quality supply of recyclable waste materials

It is not clear what "domestic reprocessing capacity" covers. i.e. UK, devolved administrations or includes the Island of Ireland but in principle, yes in the absence

of tangible evidence to the contrary.

**78 Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

As stated previously the Council believes that consideration of a DRS should be deferred until the impacts of EPR reforms are fully known. At that point the need for a DRS would be more obvious.

**79 Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?**

I don't know/ I don't have enough information

**Other (please state):**

**Please explain your answer, providing evidence where available. :**

As stated previously the Council believes that consideration of a DRS should be deferred until the impacts of EPR reforms are fully known. At that point the need for a DRS would be more obvious.

**80 Do you think an alternative approach would be a better way of achieving the outcomes?**

I don't know/ I don't have enough information

**Other (please state):**

**Please explain your answer, providing evidence where available. :**

**Further detailed questions**

**81 Are there particular local authority considerations that should be taken into account when considering whether to implement either an "all-in" or "on-the-go" model?**

**Please provide more information:**

We believe efforts should be focused on EPR reforms and that these should be implemented with a view to recover full net costs for Councils. Overall UK performance on packaging recycling can then be assessed and the need for DRS reviewed in light of this performance. Taking this staged approach not only appears sensible but also manageable for all the organisations involved.

At that stage should a DRS scheme be adopted it would be sensible to introduce an "on-the-go" scheme initially with the ability to expand to "all-in" should the need arise.

**82 Are there specific considerations associated with your local authority that DRS policy makers should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response.:**

Considerations for Local Authorities;

- \* Reduction in recycled tonnages/recycling rate - a DRS scheme should apportion tonnages back to Local Authorities in a timely manner for reporting in Waste Data Flow
- \* Potential changes to gate fees due to changes in the waste composition
- \* Potential reduced income from targeted materials e.g aluminium
- \* Reduced landfill disposal charges if littering is successfully tackled
- \* Impact on glass bring banks should glass be within scope

**83 What benefits and/or disadvantages can a DRS provide to your local authority?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

As outlined in the primary benefits of the scheme.

**84 Are there any specific considerations associated with local authorities that collect waste from designated DRS return points that we should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

Belfast City Council does not have sufficient information to provide a meaningful response.

**85 How should a DRS drive better design of packaging? Please select all that apply:**

Varying producer feed that reflect the environmental cost of the products that producers are placing on the market, An additional producer fee for producers using unnecessary and/ or difficult to recycle

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**86 Who should be involved in informing and advising on the environmental cost of products? Select all that apply**

Government, Reprocessers, Producers, Local Authorities, Waste Management companies

**Other (please specify):**

Environmental consultants, academia, in order that rigorous and independent life-cycle assessments and cost-benefit analyses can be undertaken on the information provided.

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**87 Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?**

Not Answered

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"It may be necessary to review legislation as it would apply to retail outlets in order to ensure that they do not need to be permitted as waste transfer stations, and to understand what hygiene implications there may be, particularly in smaller shops where it may be difficult to keep returned used containers fully separate from new stock.

Clearly the Government will be looking at how it ensures imported products are managed and subjected to the same obligations as drinks containers filled in the UK. arc21 is not aware of what specific measures will be needed in this regard.

Given the Government's stated objective to reduce litter, arc21 suggests that the Government may also want to look into targeted EPR schemes for smoking-related litter and used chewing gum, as both are significant sources of litter/disamenity."

**88 Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS?**

**Please specify.:**

No

**Further comments**

**89 Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?**

**Please specify.:**

We support the arc21 response to this question:

"Government should satisfy itself that proper consideration is given to the situation in Northern Ireland with particular reference to the relationship with the Republic Of Ireland, given the locality, supply chain arrangements and other influencing aspects such as Brexit implications"

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<b>Subject:</b>	Pre consultation to seek views on the successor strategy to the New Strategic Direction for Alcohol and Drugs Phase 2
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Ryan Black, Director of Neighbourhood Services Alison Allen, Neighbourhood Services Manager (West)

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

☐  
☐  
☐  
☐

## Call-in

Is the decision eligible for Call-in?

Yes

☒

No

☐

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	There have been significant levels of concern in recent years around alcohol and drug misuse in Belfast and the wider region. More recently, the inter-dependency between alcohol/drugs and mental health/suicide has been recognised and the need for those issues to be considered more effectively together.
1.2	In recognition of this, the Department of Health have initiated a pre consultation on the successor strategy to the New Strategic Direction for Alcohol and Drugs Phase 2
<b>2.0</b>	<b>Recommendations</b>
2.1	The Committee is asked to <ul style="list-style-type: none"> <li>Approve the draft Consultation response at Appendix 1.</li> </ul>
<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	The draft Consultation response is attached at Appendix 1 for Members' consideration.

3.2	<p><u>Financial &amp; Resource Implications</u></p> <p>There are no financial or resource implications for Council at present.</p>
	<b>Equality or Good Relations Implications/Rural Needs Assessment</b>
3.3	<p>The consultation document confirms that the Department of Health are aware of their equality, good relations and rural needs legal obligations in these matters.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	<p>Appendix 1 Draft Council Response</p> <p>Appendix 2 Consultation Document <a href="https://www.health-ni.gov.uk/consultations/nsd-pre-consultation">https://www.health-ni.gov.uk/consultations/nsd-pre-consultation</a></p> <p>Appendix 3 Summary Report Strategic Discussion November 2017</p>



## APPENDIX 1 - BELFAST CITY COUNCIL DRAFT RESPONSE

### PRE CONSULTATION TO SEEK VIEWS ON THE SUCCESSOR STRATEGY TO THE NEW STRATEGIC DIRECTION FOR ALCOHOL & DRUGS PHASE 2

#### Introduction

Belfast City Council welcomes the opportunity to consider and input into the pre consultation exercise to seek views on a successor strategy to the 'New strategic direction for alcohol and drugs phase 2' issued by the Department of Health on 17 May 2019. People & Communities Committee on 06 August agreed the consultation response enclosed. This response remains subject to ratification by Council on 2 September 2019 following which we can update our response with any changes and notify you of this.

Councillors continue to raise concerns about the impact of alcohol and drugs on individuals, families and communities in Belfast on an ongoing basis. As a result, a strategic round table workshop took place on this issue in 2017, facilitated by the Belfast Strategic Partnership and including Elected Members, following two notices of motion on alcohol & drugs and suicide & drug related death.

The key messages coming from that workshop were the need for strategic leadership, joint commissioning, focused outcomes, systemic change from silo working and services to integrate early and preventive interventions centred on the person's immediate and ongoing needs. A further Officer workshop on 9 July 2019 agreed these issues remain current and provide an accurate reflection of the continuing challenges experienced when operating in this area.

It remains our position that there is a need for effective leadership and that any new strategy needs to integrate and align with community planning structures regionally to ensure both regional and local impact.

We also believe any strategy must recognise the inextricable link between alcohol/drugs and mental health/wellbeing. For that reason outcomes should align with Belfast Agenda where the city seeks to ensure no one is left behind, everyone reaches their potential and experiences good health and wellbeing.

The strategy needs to be able to facilitate flexible inter-agency action across organisations but ensure collective accountability. This should include preventative universal services as well as targeted services for those individuals in need of specific help.

Additionally, the strategy should recognise the potential for non-health related services to play a positive role in addressing these issues and draw those services in to the accountability arrangements e.g. PSNI and Education. It should also seek to explore the relationship between enforcement, prevention and intervention in maximising successful outcomes.

Finally, given the prominence of related outcomes in the Belfast Agenda, Council would like to emphasise that it wants to be an active participant and co-producer of strategies to address these issues in Belfast for the benefit of its citizens.

#### Consultation Response

1. **What is your name:** Belfast City Council
2. **What is your email address:** allena@belfastcity.gov.uk
3. **Is your response on behalf of an organization:** Yes
4. **From your experience and from the findings of the Review and other sources of evidence, does NI still need a substance misuse strategy?**

Yes

5. **Should it cover both Alcohol & drug misuse**

Yes, however the strategy should integrate more effectively with other relevant strategies i.e. mental health and wellbeing (including suicide)

#### **If you wish please explain your choice**

Council seeks a straightforward approach to the next strategy and this begins with the vision to ensure we leave no one behind. The strategy therefore should be clear on how it is supporting individuals, families and communities

6. **Should they have equal priority**

Yes

7. **What should the overall vision be for any future substance misuse strategy?**

As outlined in the Belfast Agenda we need to provide the opportunity for all our residents to lead healthy, engaged and fulfilling lives as part of vibrant, growing, welcoming and sustainable communities and neighbourhoods. The strategy needs to capture how early prevention from accessing

substances that cause harm is delivered; regulating or enforcing where needed to ensure opportunity to harm is reduced and where that is not possible create treatment and support for individuals, families and communities to enable the recovery throughout their lives.

**8. Should a future substance misuse strategy have a set of values and principles?**

A future strategy underpinned by values and principles is welcomed, however the Council believes further work is required to agree values and principles that can operate across enforcement, prevention and intervention approaches.

**9. What overall outcome should we seek to achieve?**

The overall outcome should align with Belfast Agenda where the city seeks to ensure no one is left behind, everyone reaches their potential and experiences good health and wellbeing. Additionally, given the cross cutting nature of this issue, the overall outcome should seek to demonstrate how an integrated strategy adds value above and beyond the work of the relevant individual organisations.

**10. What indicators should we be measuring to demonstrate that we are working to the overall outcomes?**

Further work is required on this, however it is essential that the impact measurement tool is agreed and available for use by all partners particularly as part of delivering collaboratively via community planning. If not, it is essential a single approach is agreed for data management and evidence gathering/ building services and commissioning or we continue to work in a disparate silo way and make it more difficult operationally to respond effectively. The indicators should focus more on the difference the strategy makes at an individual, family and community level and less on how much was done.

**11. What do you believe the key focus of the strategy should be?**

Council agrees with the key areas of focus detailed below, but would highlight the strategy should explore further how these areas interact with each other for added value and maximum effect.

- Regulation, legislation & enforcement
- Supply reduction
- Prevention/early intervention
- Harm reduction
- Treatment and support
- Recovery

**12. Are you aware of any other sources of evidence, research or studies that would support action to address substance misuse and your proposed outcomes and indicators?**

A discussion note from a strategic workshop held by Belfast Strategic Partnership in 2017 is enclosed with the response and covers the main Belfast issues that remain relevant.

**13. Who needs to be involved if we are to effectively address substance misuse & address the outcomes and indicators you proposed?**

Council believes as the convener of community planning in Belfast, it should be an active participant in addressing substance misuse as part of delivering the outcome where everyone fulfils their potential and experiences good health and wellbeing to ensure no one is left behind. Additionally, service users, families, GP's, commissioners of services and delivery agents should be included.

**14. Were there any gaps in the previous strategy that need to be addressed?**

None noted, beyond what has been referenced elsewhere in this response.

**15. Are you aware of evidence-based actions that would meet these gaps?**

None

**16. Are you aware of any innovative approaches or low cost/ no cost actions that would make a difference?**

None

**17. Have you any views on where existing or additional resources should be prioritized?**

This is difficult to respond to as the previous strategy is not explicit regarding all costs. However, Council does believe there is sufficient local, national and international evidence demonstrating how prevention delivers better outcomes and value for money in the long term.

**18. Substance misuse does not have an equal impact on society. Do you believe the strategy should prioritise any of the at risk population groups?**

As outlined previously, Councils' approach to inclusive growth does recognise the need for universal services as well as services that may be targeted towards at risk population groups (including at risk geographies).



**Making life better,  
together**

*Belfast Strategic Partnership*

**Summary Report  
on the  
Mental health, drug and alcohol and addiction -  
Strategic discussion event  
  
held on  
Tuesday 28<sup>th</sup> November 2017  
  
at  
Belfast City Hall**

## Introduction

- The Belfast Strategic Partnership (BSP) hosted a strategic discussion event for City Councillors, senior representatives from a range of statutory organisations and representatives of service providers within the community and voluntary sector. A list of attendees is attached as Annex A.
- The purpose of the event was to review the level of provision of existing services and to have a strategic discussion on a more integrated and coordinated approach to delivering addiction and mental health services in Belfast.
- The event was arranged following two 'Notices of Motion' to Belfast City Council (see Annex B) and a request from MLA's to the Public Health Agency (PHA), Health and Social Care Board (HSCB) and Belfast Health and Social Care Trust (BHSCT), concerning recent issues and pressure in respect of drugs and alcohol and mental health in the greater Belfast area.
- Despite the hard work of many staff within the respective organisations, the overall impact of the pressure on health and social care services is being felt by service users and their families every day and in every part of the system, including services relating to mental health and addiction. The result of this being delays in accessing services and increasing waiting list times for treatment, quite often in the most disadvantaged areas of the city.
- This strategic discussion event set out to explore whether or not collectively, BSP offers the potential to harness a more collective approach to addressing these issues, taking into consideration:
  - An outline of need and gaps in service;
  - Existing approaches and developing good practice; and
  - Potential areas of focus for collaborative investment.

- In advance of the event, a briefing note (see Annex C) was shared with attendees, outlining the purpose and background to the event and examples of existing good partnership working within the areas of mental health and drug and alcohol services.

## **Workshop Overview**

- The workshop was facilitated by Richard O’Rawe from Stellar Leadership.
- Seamus Mullen, Chair of BSP’s Executive Programme Group, presented an overview of the issues currently being experienced within mental health and addiction services, including :
  - the context for the discussion and how this aligns with the revised approach of BSP, in supporting the delivery of the Belfast Agenda;
  - current activity across tier 1 to 4 services, both planned and in development and areas of pressure within these;
  - supporting preventative action, including action to build personal resilience and existing efforts to support treatment and crisis response; and
  - pressures being felt within the system including the growth in demand for services at a time when there is no growth in resources, issues with workforce supply and the silo approach to planning and delivering services.
- Representatives of service providers based in the community and voluntary sector, Irene Sherry (Belfast Alliance for Suicide Prevention), Thelma Abernathy (Northern Ireland Alcohol and Drugs Alliance) and Gary McMichael (Belfast Drug and Alcohol Coordination Team) then shared their reflections on the pressures those service providers were currently experiencing, including:
  - welcoming the opportunity to have a strategic discussion with the key representatives from across the statutory organisations, given the

pressures and challenges currently being faced within the community and voluntary sector

- highlighting that this was not the first time such a discussion had taken place, referencing previous Future Search exercises on drugs and alcohol and mental health and the range of existing structures taking action to address these issues
  - emphasising the need for this discussion to lead to systematic change, through informed and shared decision making and appropriate action within all sectors.
- Attendees were seated at 4 tables which broadly reflected the range of representatives and organisations. Each group was asked to consider and feedback on four group discussions outlined in Figure 1. Following this attendees were asked to individually respond to two further questions using their smart phones and 'Mentimetre' software. These questions are outlined in Figure 2.

Figure 1: Group Discussions

<b>Discussion 1</b>	<i>Reflecting on what you have heard from Séamus and members of the Alliances/DACT with regard to current action and pressure within the system, is there anything you feel needs to be added?</i>
<b>Discussion 2</b>	<i>What opportunities are there to better plan and commission together to address the needs of vulnerable people with combined drugs &amp; alcohol and mental health issues going forward – both in the short-term (next 6 months) and the medium-term (6-18 months).</i>
<b>Discussion 3</b>	<i>How can we better integrate across organisations (inside and outside of Health), across sectors (Stat, C&amp;V, private), across tiers of need and provision (prevention through to treatment) and across key areas of need (drugs and alcohol, mental health/suicide prevention and homelessness) so that we can better plan for, and react to, change and emerging issues.</i>
<b>Discussion 4</b>	<i>What outcomes do we want to see in Belfast and how can commissioning and service delivery organisations come together to agree to use the same or similar information sharing and outcome gathering / analysing systems and processes for defining and measuring outcomes.</i>

Figure 2: Individual questions using Mentimeter

<b>Question 1</b>	<i>In one word, what do we need to focus on going forward?</i>
<b>Question 2</b>	<i>What are the top three priorities for immediate action?</i>

## **Group Discussion 1**

*Reflecting on what you have heard from Séamus and members of the Alliances / DACT with regard to current action and pressure within the system, is there anything you feel needs to be added?*

### **Summary of Responses:**

- It was broadly accepted that the issues of mental health and addiction were part of wider social issues, and the Belfast Agenda provided an opportunity to consider addressing these issues in that context.
- There was consensus that a longer term plan rather than a series of quick fixes was required, to resolve the current pressures experienced within the mental health and drug and alcohol services system.
- To enable this, systematic changes needed to happen, including re-visiting the Bamford Report recommendations and learning from other countries such as Iceland and Portugal.
- It was reflected that 'silo working' was still very much the norm and to facilitate the holistic and person centred approach required, a shift to greater integration of commissioning and services was needed.
- There was a view that such integration should include both integration across pathways (Tiers) and themes, given the interlinked nature of mental health and drugs and alcohol.
- This would require improved integration between service providers from all sectors, to better facilitate access to the most appropriate services, including the ability to step up and down tiers and across different services without undue delay. The no wrong door approach was mentioned across most tables.
- It was expressed that currently there are a wide range of services, with limited awareness of what is available for local people. Rationalising and streamlining these services was viewed as an important step to increasing awareness.
- There was also discussion on the contribution weighted to suicide within the context of the gap in male life expectancy (approximately 15% of the male life



expectancy gap in Belfast is as a direct result of suicide) and the need to ensure consistency of service across trust areas and sectors.

- Greater understanding of the service pathways will improve understanding of the 'bottlenecks' within services, which are leading to longer waiting listings / times.
- There was consensus for the need to start early, with a focus on educating and empowering individuals, particularly those most vulnerable and those living in areas where there is a legacy of reliance on medication.
- There was also a view that further exploration and implementation of the pilot 'Street Triage' and 'Crisis De-escalation Service' should be undertaken. Both pilots are currently being developed under the common ground areas, which were identified at the 'Building Hope' Future Search event, and are being taken forward in conjunction with BSP.

## **Group Discussion 2**

*What opportunities are there to better plan and commission together to address the needs of vulnerable people with combined drugs & alcohol and mental health issues going forward – both in the short-term (next 6 months) and the medium-term (6-18 months).*

### **Summary of Responses:**

- There was agreement that a shift to having an outcomes focus, presented an opportunity to drive the systematic changes required and set out within the Bengoa Report.
- All groups expressed the need for a fresh approach to how commissioning and service provision operates, including the need for commissioning mental health and drug and alcohol services together.
- The establishment of a joint commissioning group, led by BSP, and a single group to oversee efforts on the connected issues of mental health and drugs and alcohol, was also discussed.

- A suggestion was also made to link this approach to the Belfast Agenda, through BSP and the ambition of reducing the gap in life expectancy.
- It was also expressed that the conversation needed to engage wider than the health family, given the impact of wider social issues (including housing) on mental health and drug and alcohol services.
- There was a view that such a shift would require action to address cultural barriers between organisations and sectors.
- There was agreement that learning could be taken from other models such as the community mental health hubs, but it was also expressed that this should not lead to further silos, but rather lead to one system that everyone feeds into. The prison healthcare model was suggested as a model that could be explored for this process.
- The current referral pathways are difficult to understand and while there are many services, these are not always accessible or known. Services need to be designed to be more personal, providing longer term support and creating links beyond treatment and into training services.
- The need for a single point of referral or contact was highlighted by most groups, with the view that this would ease the referral process.
- There was a view that the development of the 'Street Triage' and 'Crisis De-escalation Service' pilots could be taken forward within the short term, with learning used to inform potential longer term development of the schemes.
- The need for a long term evidence based plan was highlighted. Developing this in the short term should involve engagement with service users and data analysis of current trends, to support forecasting demand for future services.
- There were differing views across tables regarding funding, with one table expressing the need to address the disparity in funding between Northern Ireland and the rest of the UK. While another table commented on the need to 'fix the system' rather than solve the challenges with more funding.

### **Group Discussion 3**

*How can we better integrate across organisations (inside and outside of Health), across sectors (Stat, C&V, private), across tiers of need and provision (prevention through to treatment) and across key areas of need (drugs and alcohol, mental health/suicide prevention and homelessness) so that we can better plan for, and react to, change and emerging issues.*

#### **Summary of Responses:**

- Highlighted across a number of groups was the idea of developing a single joint commissioning group, which could be led by Belfast Strategic Partnership.
- It was recognised that while such integration would be beneficial, it would also be challenging and require strong leadership, to bring everyone together.
- Fundamental to this change will be the alignment or amalgamation of existing groups, to ensure a more effective structure at both the strategic and operational level. This would also allow for the harnessing of experiences, knowledge and information across sectors, promoting respect, improving communication and providing a stable platform for co-production.
- There is a requirement to shift from a focus on activities to outcomes. The starting point for this will be to identify the outcomes we wish to see for the city, ensuring the needs of people at the centre of these outcomes.
- Given the longer term nature of outcomes and the need to ensure progress is being made, it was suggested that developing a good evidence base, including indicators, data analysis and qualitative case studies, would be essential to develop an improved shared understanding of need for services and service impact.
- There is a requirement to ensure other relevant agencies / partners are involved throughout, so that they feel part of the process.
- The need to adopt a 'no wrong doors' approach was highlighted, including the opportunity to co-locate services within the same physical space and to develop more open referral pathways, which allow referrals to be diverted to the most appropriate service.

- It was highlighted that the sector is too complex and that simplifying it could improve understanding of available services.
- Also noted was the potential limitations and opportunities which procurement offered and the need to explore how best to utilise this opportunity, to provide flexibility to meet changing needs. The role and opportunity of social prescribing was also considered.
- Finally, the need to target services to those most vulnerable and at greatest risk of experiencing the shortest life expectancy was expressed.

#### **Group Discussion 4**

*What outcomes do we want to see in Belfast and how can commissioning and service delivery organisations come together to agree to use the same or similar information sharing and outcome gathering / analysing systems and processes for defining and measuring outcomes.*

#### **Summary of Responses:**

- There was discussion on the need to develop and agree the 'operational big picture', including linking these issues to the Belfast Agenda and the partnership structures for community planning and the need to 'de-clutter' the structure within mental health and drug and alcohol services.
- Establishing a joint commissioning group, led by BSP, was identified. This group would look at the redesigning of services and structures and how resources are allocated.
- There is a need to focus more on prevention, taking action against the underlying issues / determinants which lead to people requiring mental health and drug and alcohol services.
- It was suggested that people must be directly connected to the services they need from the point of entry and that this should include people under the influence of drugs and/ or alcohol.
- There was also discussion on the need for a targeted approach for people at increased risk such as those leaving prison, children and young people and

people who are homeless. There is also consideration to be made to these issues extending beyond areas of deprivation.

- There is a need to introduce a central contact point within BHSCCT for prison healthcare.
- The opportunity to develop a co-production pilot should be undertaken across sectors to support and develop respect and improve shared understanding.

Following roundtable discussion and feedback, attendees were asked a further two questions individually, using 'Menti-metre' software and their smart phone. The first question created a 'word cloud' which captured the individual responses and presented the most common of these responses in larger text. There were clearly four words which were commonly used throughout this exercise:

- Action
- Listen
- Collaborate
- Integration

### Individual Question 1

*In one word, what do we need to focus on going forward?*

**The following word cloud was generated from responses:**



The second question using menti-metre asked for individuals to record the three priorities for immediate action they would like to see. This exercise generated a list of more than 50 statements / actions, the most common of which are listed below.

### **Individual Question 2**

*What are the top three priorities for immediate action?*

#### **Most common priorities identified:**

1. Strategic leadership
2. Link to Belfast Agenda
3. Joint commissioning
4. Audit of existing services
5. Gap analysis
6. Central point of referral
7. Integration of pathways across tiers and organisations
8. Develop and implement pilot Street Triage and De-escalation Services
9. Outcomes focus
10. Focus on prevention

## Summary / Conclusion

The context for this strategic discussion event was set within the Notices of Motion to Belfast City Council (see Annex B), which framed the need for a citywide response to addressing issues associated with drug and alcohol misuse and mental health, within the Belfast Agenda.

Specific reference was made to the workstream associated with Belfast Strategic Partnership, which will 'design and deliver an integrated city programme to address health inequalities, including enhancing mental wellbeing and reducing social isolation'.

Within this context, the discussion generated a number of areas for focus including:

- The need for strong leadership, to provide strategic direction on the development of a shared 'big picture' for the areas of drugs and alcohol and mental health, to include the development of a long-term, evidence based plan. This would also include leadership to bring about the systematic and cultural change required to realise a radical shift to a more integrated system.
- A focus on defining the desired outcomes for mental health and drug and alcohol services, which place people and prevention at the core. These outcomes should link with the Belfast Agenda and the ambition to reduce the gap in life expectancy, while also ensuring the ongoing involvement of agencies with responsibility for the wider determining factors which contribute to the need for mental health and drug and alcohol services.
- Creating increased understanding of services and need for services, including service pathways and gaps in services, by undertaking a comprehensive audit and needs assessment. This would provide a strong evidence base on which to simplify services, increase awareness of services at a community level and monitor impact of services against the desired outcomes.
- Redesigning mental health and drug and alcohol service delivery utilising the principles of co-production, to remove silo approaches, improve integration between and across services and sectors and develop a 'no wrong door'



approach. Central to this would learning from other models and regions, including those which adopt a single point of referral and those which follow a targeted approach.

- Developing revised mechanisms at both the strategic and operational levels, to support the joint commissioning of, and delivery of, mental health and drug and alcohol services. This would be taken forward through the alignment or amalgamation of existing structures rather than through the creation of new structures, capturing and harnessing the skills, knowledge and expertise which exists across the sector.

Feedback from this event will now be shared with BSP for further consideration, within the context of reducing the life expectancy gap between the most and least deprived neighbourhoods in Belfast, as outlined in the Belfast Agenda.

## Annex A: List of attendees



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*Belfast Strategic Partnership*

Thelma Abernathy	Northern Ireland Alliance for Drugs and Alcohol
Alison Allen	Belfast City Council
Cllr David Armitage	Alliance
Cllr Tim Atwood	SDLP
Stephen Barr	Belfast Alliance for Suicide Prevention
Stephen Bergin	Public Health Agency
Brenda Bradley	Health and Social Care Board
Joe Brogan	Health and Social Care Board
Valerie Brown	Belfast City Council
Cllr Sonia Copeland	Ulster Unionist Party
Cllr Steven Corr	Sinn Fein
Alderman Patrick Convery	Independent
Paul Cummings	Health and Social Care Board
Iain Deboys	Health and Social Care Board
Matthew Dolan	Health and Social Care Board
Jacqui Frazer	Belfast Health Development Unit
Rachel Gibbs	South Eastern Health and Social Care Trust
Kelly Gilliland	Public Health Agency
Nigel Grimshaw	Belfast City Council
Carolyn Harper	Public Health Agency
Cllr Brian Heading	SDLP
Anne-Marie McClure	Northern Ireland Alliance for Drugs and Alcohol
Valerie McConnell	Health and Social Care Board
Cllr Mary McConville	Sinn Fein
Cllr Paul McCusker	SDLP
Gary McMichael	Belfast Drug and Alcohol Co-ordination Team
Barney McNeany	Belfast Health and Social Care Trust
Jim Morgan	Belfast Health Development Unit
Séamus Mullen	Public Health Agency
Robert Murdie	PSNI
Cllr Charlene O'Hara	Sinn Fein
Brian O'Kane	NI Housing Executive
Maria O'Kane	Belfast Health and Social Care Trust
Alderman Jim Rodgers	Ulster Unionist Party
Irene Sherry	Belfast Alliance for Suicide Prevention
Sinead Simpson	Department of Justice
Alderman Guy Spence	DUP
Andrew Steenson	Belfast Health Development Unit
Noel Taggart	South Eastern Health and Social Care Trust
Siobhan Toland	Belfast City Council

## **Annex B: Notices of Motion to Belfast City Council**

### **Notice of Motion – May 2017 Proposed Cllr O’Hara, seconded Cllr McCabe**

“In recognition of the devastation that many families face when losing loved ones due to drug and alcohol misuse, or the impact of suicide within our communities, we recognise the need for a City wide response to support our communities in dealing with these issues.

As the Council has committed, through the Belfast Agenda, to 'design and deliver an integrated city programme to address health inequalities, including enhancing mental wellbeing and reducing social isolation', we agree to establish a forum with our strategic and community partners to address the critical issues of mental health and drug and alcohol addiction support services.

Through this discussion, we aim to identify current levels of provision across drug, alcohol, and mental health services through a mapping exercise, begin a strategic discussion about a dual diagnosis model and to develop a cohesive and co-ordinated strategy on positive mental health for our citizens.”

### **Notice of Motion - October 2017, proposed Cllr McCusker, seconder Cllr Attwood**

#### **Drugs Related Deaths and Suicides**

“This Council notes with growing concern the rise of drug related deaths and suicides in the city and across Northern Ireland and calls on local and central government to make tackling this epidemic a priority.

The council agrees to seek an urgent cross party meeting with the Health and Social Care Board, the Public Health Agency, the Belfast Health and Social Care Trust and the community and voluntary sector working on the front line dealing with this growing problem to agree a co-ordinated action plan.”

The Council noted that, in order to ensure that there was a co-ordinated approach to addressing addiction related issues, the actions called for within Councillor McCusker’s motion would be progressed alongside those within Council O’Hara’s motion on Mental Health and Addiction Support Services which had been passed by the Council at its meeting on 2nd May and which had already commenced.

## **Annex C: Briefing note for strategic discussion event**

### **Briefing Note** **Drug and alcohol, mental health and addictions in Belfast** **Strategic Discussion Event 16<sup>th</sup> October 2017**

#### **Purpose**

The purpose of this briefing is to highlight recent issues and pressure in respect of drugs and alcohol and mental health in Belfast. Following a Notice of Motion proposed at Belfast City Council's meeting in May regarding these issues and a subsequent Notice of Motion proposed at the October Council meeting, the joint Chairs of Belfast Strategic Partnership have proposed a meeting between Councillors and the main statutory organisations responsible for commissioning and delivering services to explore this issue further and explore the ability of BSP to assist through collaborative action.

The purpose of the meeting is to review the level of provision of existing services and have a strategic discussion on a more integrated and coordinated approach to delivering addiction and mental health services in Belfast.

The meeting will be attended by Directors and senior management of the main statutory organisations in the city and organisations representing the service providers in the community; specifically the Chairs and Deputy Chairs of NI Alcohol and Drug Alliance, Belfast Alliance for Suicide Prevention and Belfast Drug and Alcohol Coordination Team.

#### **Background**

There has been mounting pressure on drug and alcohol services throughout the city and over the past 12 months there has been a significant number of drug related deaths.

- All services, statutory and community and voluntary, are under significant and severe pressure. Resources, including money and staff are an issue, however questions are also being raised about whether the services as they are currently delivered are 'fit for purpose' and meeting the needs of individuals and communities.
- There is a need for commissioners and service providers (HSCB, PHA, LCG, BHSCT etc.) to come together to review and plan their services and their investments together. Health and Wellbeing 2026: Delivering Together, sets the case for radical change within the health and social care system, recognising that maintaining current delivery models, is having an increasingly negative impact on the quality and experience of care for many services users, while constraining the ability of the system to transform to meet 21st century health needs.

- The substitute prescribing service and waiting times have recently been the main focus of media reports, political engagement and community tension. At one point the waiting time for Substitute Prescribing was running at 18 months in Belfast for a complex range of reasons.
- Statistics show significant numbers of patients are experiencing long waiting times for mental health and addictions services in the City, and this has the potential to have a significant impact in the coming months/years.
- Within community and voluntary sector services mental health and suicide prevention services are now having to respond to and or cope with drug and alcohol misusing clients and drug and alcohol services are doing likewise in terms of trying to support mental health and suicide prevention (where the terms of their contract allow it and where they have the capacity and skills to do so for both scenarios). Within statutory services it still appears that people are falling between the two services. There is a need to commission services that can deal with both mental health and drug and alcohol issues and if this is not possible there is at least a need to review and plan drug and alcohol services with the implications for mental health services in mind and vice versa.
- There are a wide range of skilled and experienced drug and alcohol and mental health and suicide prevention service providers in Belfast that can contribute to the discussion on finding possible solutions to addressing the service pressures both in the short term as well as long-term.

### **Belfast City Council**

As a result of the above issues and pressures being felt on the ground within the most deprived communities a Notice of Motion regarding mental health and addiction support services, was taken forward at the May Council meeting, with a second Notice of Motion being presented at the October meeting. Through this process the Councillors expressed concerns regarding the availability of joined up services designed to treat the complex issues of addiction, the misuse of drugs and alcohol and mental health. The Notice of Motion in May proposed a review of the level of provision of existing services and a strategic discussion on a more integrated and coordinated approach to delivering addiction and mental health services in Belfast. It considered the need for a city wide response to support communities in dealing with these issues in line with the commitment the Council has given, through the Belfast Agenda, to design and deliver an integrated programme to tackle health inequalities.

### **The approach needed**

Addressing the significant and complex challenges associated with mental health and addiction requires complementary and coordinated action from a range of partners. Good partnership working already exists in the city with many organisations and sectors being linked into partnerships such as Belfast Strategic Partnership, the Drug and Alcohol Coordination Team, the Protect Life Implementation Group and the Policing and Community Safety Partnerships. There are already many excellent examples of partnership working which focus on the misuse of alcohol and drugs and emotional distress and mental disorders, including:

- The 11 areas of 'common ground' which emerged from the 'Building Hope – Working Together to Prevent Suicide' Future Search event which took place in September 2016 and the subsequent BPLIG Action Plan.
- The establishment of cross sector teams to design a Crisis De-escalation Service and Street Triage pilot programmes.
- Joint working and pooled resources between PHA and Belfast PCSP in areas of street triage, homelessness, campaign and networking events to raise awareness of services.
- Developing a joint protocol and practice between PSNI, PHA and BCC regarding sharing information on vulnerable individuals in the Belfast City Council Area.
- Investment in a pilot project to provide experienced sessional workers to engage those using intravenously on the street, help reduce drug related litter and potential overdoses in the City Centre in a limited out of hours service for a trial period
- Joint working between PHA and BCC to implement a rapid sharps collection and disposal service for collection of drug related waste from public spaces.
- Exploring options with PSNI, PHA and BCC to jointly invest in harm reduction approaches in homeless hostels.
- Work to develop and design a new Emotional Resilience Strategy and Action Plan for Belfast 2018-2021
- The launch of Take 5 steps to wellbeing Toolkit designed to support organisations and practitioners to help individuals to develop emotional resilience and wellbeing. Resources from the toolkit can be downloaded at [www.makinglifebettertogether.com](http://www.makinglifebettertogether.com)
- The development of the 'Have Your Say Belfast' emotional wellbeing survey, which was recently completed by just under 5000 residents. The results in the recent survey highlighted inequality in the requirement for treatment for anxiety and depression with a higher proportion of people living in deprived areas indicating they had received treatment for these conditions compared with those living in other parts of the city. The survey results also showed that lack of connection to family and friends appeared to be a factor in those individuals receiving treatment. It underlined the need for multi-agency approaches and cross-departmental working to address the issues underlying poor level of emotional health and wellbeing in the city.
- Successful outreach work in relation to the homeless sector. Under the Belfast City Centre Street Management Strategy the Police and Community Safety Partnership provided short term assistance to the Welcome Organisation to enable it to engage directly with individuals presenting with complex needs, often associated with drug and alcohol misuse and mental ill health. The project, although short term had some success and there are currently ongoing discussions with a number of organisations to explore options for a further roll out of a project aimed at targeting those most in need.

The above examples were highlighted to the Belfast City Council's People and Communities Committee on 7 June 2017 as part of the initial response to the Notice of Motion on Mental Health and Addiction Support Services.

### **Suggested way forward**

The complex issues outlined in this briefing note are being taken forward by a work stream under the Belfast Strategic Partnership, within the context of the Belfast Agenda and addressing health inequalities. The Partnership is supporting an initial small focused discussion event involving the relevant senior representatives from the sponsoring organisations of BSP, senior representatives from the Health and Social Care Board and the representatives from each of the political party groups within Belfast City Council. The focus of this discussion will be on

- Structural issues in the management of drug and alcohol policy and services that would assist in embedding change
- Addressing data collection and sharing
- Whole system approach to maximising impact (incorporating innovation and best practice)
- Defining and measuring outcomes

The event will also explore whether or not collectively Belfast Strategic Partnership, via the Belfast Agenda, offers the potential to harness a more effective approach to addressing these difficult issues.

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<b>Subject:</b>	NIHE Chronic Homelessness Action Plan 2019 Consultation
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Ryan Black, Director of Neighbourhood Services Alison Allen, Neighbourhood Services Manager (West)

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

☐  
☐  
☐  
☐

## Call-in

Is the decision eligible for Call-in?

Yes

☒

No

☐

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	There have been significant levels of concern in recent years around levels of homelessness in both Belfast and the wider region. More recently, it has been recognised that many of those who find themselves homeless have a range of complex additional needs e.g. addictions and/or mental health.
1.2	In recognition of this, NIHE are formally consulting on their draft Chronic Homelessness Action Plan, which recognises this specific client group.
<b>2.0</b>	<b>Recommendations</b>
2.1	The Committee is asked to; <ul style="list-style-type: none"> <li>Approve the draft consultation response at <b>Appendix 1</b>.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<p><u>Key Issues</u></p> <p>3.1 The draft consultation response is attached at <b>Appendix 1</b> for Members' consideration.</p> <p><u>Financial &amp; Resource Implications</u></p> <p>3.2 There are no financial and resource implications for Council at present.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>3.3 The consultation document confirms that NIHE are aware of their equality, good relations and rural needs legal obligations in these matters.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	<p>Appendix 1 Draft Council Response</p> <p>Appendix 2 NIHE Consultation Document</p>

# Public Consultation

## Chronic Homelessness Action Plan

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Please use this consultation template for submitting your responses and comments.

Alternatively, the online consultation can be downloaded at <https://www.nihe.gov.uk/Working-With-Us/Partners/Consultations> where you can also view the full consultation report and the associated screening documents.

If you are completing an electronic version of this form, it should be emailed to: [homelessness.strategy@nihe.gov.uk](mailto:homelessness.strategy@nihe.gov.uk).

Alternatively, you can return hard copies of the completed form to:

Helen Hicks, (Homelessness Policy & Strategy)

1<sup>st</sup> Floor South,

9 Lanyon Place,

Belfast,

BT1 3LZ

The Housing Executive welcomes any comments you wish to make on all of the proposals or just on those issues that are of particular interest to you in the consultation.

All responses should be received by 5pm on Friday 2<sup>nd</sup> August 2019 to ensure they can be fully considered.

## **Freedom of Information Act 2000**

### **Confidentiality of Consultations**

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

The Freedom of Information Act gives the public the public a right of access to any information held by a public authority, namely the Housing Executive in this case. This right of access to information includes information provided in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or treated as confidential.

The means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Housing Executive should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Housing Executive's functions and it would not otherwise be provided.
- The Housing Executive should not agree to hold information received from third parties 'in confidence' which is not confidential in nature.
- Acceptance by the Housing Executive of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office (or see the website at:

<http://www.informationcommissioner.gov.uk/>)

## YOUR DETAILS

**Organisation:** Belfast City Council

**Name:** Alison Allen

**Postal Address:** Belfast City Hall, BELFAST

**Postcode:** [Click here to enter text.](#)

**Email:** [Click here to enter text.](#)

### Criteria for Chronic Homelessness

The Housing Executive has provided criteria to identify the number of individuals/households experiencing chronic homelessness. Do you agree with these criteria? Please choose yes or no below.

Yes

Please provide any supporting comments below. In particular we are keen for the consultation to explore whether there are too many or too few criteria and whether the criteria need to be further defined and we would welcome any comments relevant to these points

To consider the criteria, Council reviewed how the action plan was defining chronic homelessness particularly relating to the categorisation of homelessness.

In chapter 6 the definition of homelessness provided sets out 3 categories of homelessness namely, transitional, episodic and chronic homelessness. Each defines the circumstance of the homeless event however there is insufficient definition in each category which specified the level of support needs required.

The development of specific criteria to determine whether an individual is 'chronic homeless' is welcomed, however a matrix approach may be useful to understand how the different elements interact to determine the persistence/severity and associated level of support required.

### Objective One

Do you agree with objective one which is to 'Design specific criteria for measuring chronic homelessness and implement data collection arrangements'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

The development of specific criteria to determine whether an individual is 'chronic homeless' is welcomed, however a matrix approach may be useful to understand how the different elements interact to determine the persistence/severity and associated level of support required.

Do you agree with the actions in objective one? Please choose yes or no below.

Yes

Please provide any supporting comments below:

As well as alignment to the Programme for Government, NIHE should ensure alignment to the Community Plan for each local government district.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## **Objective Two**

Do you agree with objective two which is to 'Introduce mechanisms to monitor and report on chronic homelessness trends'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Specific mechanisms to monitor and report on performance and trends is welcomed as an evidence based approach to joint resourcing & monitoring & evaluation of services is much needed. However, it is recommended this needs to align with the monitoring and reporting mechanisms of other agencies given the cross cutting nature of this issue.

Do you agree with the actions in objective two? Please choose yes or no below.

Yes

Please provide any supporting comments below:

The implementation of some actions being entirely dependent on additional resource should be revisited. Public bodies have a duty to continuously improve their services and seek opportunities for efficiency. If these actions are considered a priority to support the most vulnerable people in society, then efficiencies must be found elsewhere to ensure the necessary resources are available.

The service users forum is a welcome step in keeping with Council's wish that services meet the needs of customers and that customers have the opportunity to influence those services.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## Objective Three

Do you agree with objective three which is to 'Utilise chronic homeless data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Evidence based decision making at all levels in addressing chronic homelessness is required to ensure services are effective and efficient.

Do you agree with the actions in objective three? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Council would wish to emphasise the need to ensure data and trend information reflects both quantitative and qualitative perspectives, particularly given the sensitive nature of this work. Using informal methods of gathering information i.e. focus groups will assist in ensuring any evidence based approach effectively draws out the importance narrative as well as statistics.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## Objective Four

Do you agree with objective four which is to 'Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective four? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Consideration should be given to working with existing chronic homeless clients to map out their end to end journey across support agencies, with a specific focus on identifying common opportunities that may have been missed to prevent the homelessness escalating.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## Objective Five

Do you agree with objective five which is to 'Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective five? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

The triage service is welcomed, particularly the potential active role Councils' front line services could provide. However, given the level of vulnerability with this client group and the complexity of their needs, further detail is needed on the robustness and accountability arrangements in place for multi-agency case management. The risk of multiple services working with a vulnerable client at crossed purposes can seriously undermine the possibility of a positive outcome for that person and this risk should be urgently minimised.

## Objective Six

Do you agree with objective six which is to 'Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Council is very aware of ongoing criticism that public services are not responsive and agile enough to meet the needs of the most vulnerable in society. We therefore welcome the commitment in ensuring services engage with those at risk of chronic homelessness as quickly as possible as that is the most effective way to ensure a positive outcome.



Do you agree with the actions in objective six? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## **Objective Seven**

Do you agree with objective seven which is to 'Make the stay in temporary accommodation as short as possible'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective seven? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Council fully supports this position and believes that a rights based approach should be taken. Everyone has the right to a stable environment they call home and where they feel safe. However, Council wishes to emphasise that given the complexity of additional needs, a greater focus is needed on providing dedicated support to vulnerable clients to sustain their tenancy long term.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## **Objective Eight**

Do you agree with objective eight which is to 'Consider a range of housing options for the chronic homeless including Housing First and ensure they are supported into permanent accommodation as soon as possible'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Council supports models like Housing First and encourages their roll out by looking innovatively and flexibly at housing stock and working in partnership with the community, voluntary and private sector to meet the needs of this client group. Council would also wish to emphasise previous comments around ensuring the appropriate support is provided to vulnerable individuals to ensure they can maintain a tenancy long term.

Do you agree with the actions in objective eight? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

## Objective Nine

Do you agree with objective one which is to 'Promote interagency issues and actions required to address chronic homelessness'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Council is supportive of this objective, however believes it should extend beyond the 'promotion' of inter-agency issues given the high levels of vulnerability with this client group. Council believes NIHE should implement an inter-agency management and assurance framework which ensures all partners are accountable for the services they deliver.

Do you agree with the actions in objective nine? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

Council would also highlight the need to provide training and awareness raising to front line staff from other statutory agencies on how they can best assist.

## Objective Ten

Do you agree with objective one which is to 'Ensure mechanisms in place to implement and oversee the implementation of the Chronic Homelessness Action Plan'? Please choose yes or no below.

Yes

Please provide any supporting comments below:

[Click here to enter text.](#)

Do you agree with the actions in objective ten? Please choose yes or no below.

Yes

Please provide any supporting comments below:

Yes, however, Council would re-emphasise previous comments that accountability and assurance need to operate at all levels (strategic, operational and front line) given the high levels of vulnerability within this client group.

Are there any further actions you feel should be considered as part of this objective? If so, please provide details below:

[Click here to enter text.](#)

Please provide any further comments you may have on the Chronic Homelessness Action Plan below:

Belfast City Council welcomes the opportunity to consider and respond to the public consultation on the Chronic Homelessness Action Plan issued by the Housing Executive in May 2019. People & Communities Committee on 6 August agreed the consultation response enclosed. The above response remains subject to ratification by Council on 02 September 2019 following which we can update our response with any changes and notify you of this.

Council agrees it has a pivotal role in highlighting the need for collaborative and co-ordinated action on homelessness in the city & welcomes the opportunity to respond to the chronic homelessness action plan.

In recent years there have been high levels of interest and concern from Elected Members around homelessness and associated vulnerabilities in Belfast and the region. Most recently in February 2019, following a Notice of Motion, Council agreed 'through the office of the Mayor, to convene a statutory and non-statutory multi-agency task group that will seek to take further partnership actions in addressing all facets of homelessness.'

This task group was to bring together the relevant statutory and voluntary service providers for those living with addiction and mental health issues and those who have no place to call home.

This reflects the sentiment in appendix A of the main consultation that declares chronic homelessness as “chronic as in health and homeless in terms of housing” and this dual purpose needs to be obvious in the final action plan to ensure the outcomes in the Belfast Agenda, namely ‘to leave no one behind’ are met for those experiencing chronic homelessness.

The first meeting of this task group took place on 17 May 2019 and was led by Lord Mayor Deirdre Hargey.

## **Health**

The community plan provides opportunity to commission person centre and integrated support for people experiencing vulnerabilities. It also extends the opportunity to innovate and create new ways of providing the support needed via community and neighbourhood led support hubs and support networks.

## **Housing**

As the lead authority on HMOs and licensing along with the planning vires, Council believes that a strategic and collegiate approach to developing future housing options is a real opportunity to adapt & commission new build proposals to reflect the specific needs of chronically homeless individual including single lets, tiered housing schemes and supported housing. As part of the consultation statistics on homelessness and levels of occupancy have been provided. However, it is unclear from information available whether the type of current and planned housing provision specifically meets the needs of the chronically homeless.

## **Partnership & collaboration**

In response to need, Council has developed its community safety and health/wellbeing services to work more effectively in partnership with other statutory, community and voluntary services supporting those who may be chronically homeless and/or vulnerable. This role has grown and we seek to be a dynamic co-producer of this with our partners to ensure we ‘leave no one behind’. We think community planning provides the strategic umbrella to think differently & commission the required services and action to remove chronic homelessness in the city. In this situation we request that the task group that is being established is a window of opportunity to progress many of the objectives in this action plan.



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# CHRONIC HOMELESSNESS ACTION PLAN

MAY 2019

*ending homelessness **TOGETHER***

# Chronic Homelessness Action Plan

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Appendices (Available at <https://www.nihe.gov.uk/Working-With-Us/Partners/Consultations> during the consultation period)

Appendix A: Consultation document - Accommodation and Non-accommodation Based Issues

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- UK
- Wider Context
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# FOREWORD

We are pleased to introduce our first Chronic Homelessness Action Plan, which focuses on the Housing Executive's commitment, set out in the Homelessness Strategy 2012-17 for Northern Ireland 'Ending Homelessness Together', to develop appropriate responses to address the needs of the population in Northern Ireland experiencing chronic homelessness.

This action plan sets out what we plan to do with the support of our partners in the statutory, voluntary and community sectors, over the course of the next three years, to tackle chronic homelessness. We have grown in our understanding of the complex issues which contribute to chronic homelessness. It is more than just a housing issue which can lead to a cycle of repeat homelessness. Issues such as family breakdown, addictions, mental and physical health issues, engaging in street activity including rough sleeping and encounters with the criminal justice system can contribute to people experiencing chronic homelessness.

The impact of chronic homelessness on an individual or a household can be devastating and extremely difficult to exit from. There are many opportunities through the provision of advice, assistance and support to promote early intervention to stop an individual or household reaching the point of chronic homelessness. The needs of those experiencing chronic homelessness are wide ranging and this action plan supports a rapid response that ensures housing provision and support services are tailored to meet the needs of each individual appropriately.

This action plan shows the Housing Executive's commitment to introducing new ways of working which will see us working collaboratively with a range of stakeholders across the statutory, voluntary and community sector in the best interests of this group of people. The Housing Executive is constantly seeking to improve our engagement with the sector and that engagement has been vital in identifying the aims and objectives for the Chronic Homelessness Action Plan and in helping to identify appropriate actions.

The outcomes based approach approved by the Programme for Government (2016-21) has been adopted by the Housing Executive in its delivery of the Homelessness Strategy and will be extended to the delivery of this Chronic Homelessness Action Plan

We wish to express our sincere appreciation to those organisations, services users and our own Housing Executive staff who took the time to participate in the extensive consultation exercises in the development of this action plan. Their input was instrumental in improving our understanding of chronic homelessness and has led to the development of criteria to define an individual who can be said to be experiencing chronic homelessness.

The development of the Chronic Homelessness Action Plan will seek to measure and understand the scale of the problem and improve early intervention which will lead to a reduction in the number of individuals or households affected by chronic homelessness. We know this is a complex issue, and we have more work to do. This is why we are committed to keeping this action plan under review and to continue to develop our approach to respond to the challenges of chronic homelessness.

Throughout the document we have indicated aims, actions and outcomes. Following this consultation and subsequent approval of the final action plan an implementation programme over the next three years to achieve these actions will commence. This will be more difficult due to the increasingly challenging context we face in terms of addressing homelessness in Northern Ireland. We remain confident, however, that by working together, with all our partner agencies we will achieve the aims set out in this action plan and make a positive change.

# Chronic Homelessness Action Plan

## EXECUTIVE SUMMARY

There is no doubt that the experience of homelessness is difficult and troubling for anyone who experiences it. However, when considering how to most effectively prevent and respond to homelessness, it is beneficial to differentiate the homeless population in terms of length and severity of experience. Specifically, to consider those who are experiencing chronic homelessness, i.e. 'a group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness'.<sup>1</sup>

Although individuals and families experiencing chronic homelessness account for a minority of the homeless population, their diverse needs, mental and physical health issues, addictions, legal and justice issues and the discrimination they may face all tend to be much more severe. Moreover, in spite of their smaller numbers, the services required to address chronic homelessness require proportionately more resources from the homelessness system. This group is much more likely to experience catastrophic health crises requiring medical intervention, and a greater prevalence of contact with the criminal justice system.

We know from research that the longer an individual or household is homeless, the greater the impact on their health and well-being. Social and economic isolation increases, making it much more challenging to reverse the cycle of homelessness and reintegrate into the community.

The Chronic Homelessness Action Plan has been developed in response to feedback from the homelessness sector in the delivery of the Homelessness Strategy 2017-22. The Homelessness Strategy Steering Group (HSSG) is an inter-departmental, multi-agency group tasked with ensuring the strategic delivery of the Strategy and the Housing Executive made a commitment to HSSG in March 2018 to develop an action plan that specifically addresses chronic homelessness.

The vision of the Homelessness Strategy is 'Ending Homelessness Together' and this action plan will support this vision. If we are to address chronic homelessness we will require input and support from a range of stakeholders across the statutory, voluntary and community sectors. This action plan shows the Housing Executive's commitment to introduce new

ways of working internally as well as support for a range of cross-government initiatives which will see us working jointly on these new approaches. The Housing Executive is constantly seeking to improve our engagement with the sector in the delivery of the Homelessness Strategy and that engagement has been crucial in identifying the need for the Chronic Homelessness Action Plan and helping identify appropriate actions.

The Chronic Homelessness Action Plan will align with the Homelessness Strategy and covers a three year period from April 2019 to March 2022. Originally the Homelessness Strategy identified two actions relevant to chronic homelessness:

- Review and implement Belfast and Derry/Londonderry Rough Sleepers Strategy.
- Identify chronic homeless need outside Belfast and Derry/Londonderry and devise appropriate action plan to tackle any issues.

With the agreement of the HSSG and Central Homelessness Forum these two actions are both incorporated in to this action plan. This plan focuses on the need to:

- Improve the measurement and understanding of the scale of the problem of chronic homelessness and establish a baseline.
- Promote early intervention and prevention of chronic homelessness.
- Provide a rapid response to chronic homelessness to ensure interventions are effective and well targeted.
- Promote a cross departmental and inter-agency approach to addressing the problem of chronic homelessness.

1 A Review of Single Homelessness in the UK 2000 – 2010 Anwen Jones and Nicholas Pleace', Crisis (2010) [http://www.crisis.org.uk/data/files/publications/ReviewOfSingleHomelessness\\_Final.pdf](http://www.crisis.org.uk/data/files/publications/ReviewOfSingleHomelessness_Final.pdf)

Objectives of this action plan are to:

1. Design specific criteria for measuring chronic homelessness and implement data collection arrangements.
2. Introduce mechanisms to monitor and report on chronic homelessness trends.
3. Utilise chronic homeless data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision.
4. Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness.
5. Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment.
6. Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible.
7. Make the stay in temporary accommodation as short as possible.
8. Consider a range of housing options for the chronic homeless including Housing First and ensure they are supported into permanent accommodation as soon as possible.
9. Promote inter-agency issues and actions required to address chronic homelessness.
10. Ensure mechanisms are in place to implement and oversee the implementation of the Chronic Homelessness Action Plan.

The action plan supports the Homelessness Strategy in the early intervention and prevention of homelessness and local joint working. Subject to identified need the action plan will link to relevant commissioning and/or grant funding structures to provide more statutory homelessness and support services that are specifically relevant to the needs of those within the chronic homelessness category.

The aim to reduce chronic homelessness will be undermined without improvements to housing options and this action plan has attempted to help address both the causes of homelessness and to ensure that homeless households have access to settled, affordable and suitable housing.

Without these improvements, the situation is likely to escalate resulting in more pressure on services and funding. From a Housing Executive perspective this will lead to 'gate-keeping' of services, increased out-of-area placements and repeat homelessness, with damaging consequences for individuals and households experiencing chronic homelessness, and little improvement in meaningful outcomes.

Consultation is an important aspect in the formation of the action plan and the Housing Executive welcomes all feedback during the twelve week consultation period.

The Housing Executive has taken cognisance of relevant legal obligations in the production of the action plan. The Housing Executive Equality Unit has reviewed and confirmed that the Equality Screening template developed for the Homelessness Strategy is applicable to the Chronic Homelessness Action Plan. As a result the Housing Executive is satisfied that the existing screening report adequately covers existing issues and principles within the Chronic Homelessness Action Plan. The equality issues will be subject to an annual review to ensure the action plan is relevant to any issues that may arise on an annual basis between now and the conclusion of the action plan.

Consultation with the NIHE Rural Unit has taken place during the development of this action plan to ensure rural needs are reflected. The plan has been completed with due consideration for the Rural Needs Act (NI) 2016 and as a result a Rural Needs Impact Assessment has been published alongside the Chronic Homelessness Action Plan for public consultation.

# Chapter 1

## INTRODUCTION

Chronic homelessness is a state at the most severe end of the homelessness spectrum. It can manifest itself in a wide range of circumstances including, but not exclusive to rough sleeping or street activity.

There is no doubt that the experience of homelessness is difficult and troubling for anyone who experiences it. However, when considering how to most effectively prevent and respond to homelessness, it is beneficial to differentiate the homeless population in terms of length and severity of experience. This action plan specifically considers those who are experiencing chronic homelessness i.e. ‘a group of individuals with very pronounced and complex support needs who find it difficult to exit from homelessness.’<sup>2</sup>

Although individuals and families experiencing chronic homelessness account for a minority of the homeless population, their diverse needs, mental and physical health issues, addictions, legal and justice issues and the discrimination issues they may face tend to be much more severe. Moreover, in spite of their smaller numbers, the services required to address chronic homelessness require proportionately more resources from the homelessness system. This group is much more likely to experience catastrophic health crises requiring medical intervention and a greater prevalence of contact with the criminal justice system.

Research indicates that the longer an individual or household is homeless, the greater the impact on their health and well-being. Consequently, social and economic isolation increases, making it much more challenging to reverse the cycle of homelessness and reintegrate into the community.

Rough sleeping is widely acknowledged as being the most visible form of chronic homelessness but those experiencing chronic homelessness extends beyond those who sleep rough. Characteristically, individuals who are experiencing chronic homelessness tend to have multiple support needs which leads to their inability to sustain a permanent tenancy, or a temporary accommodation placement, and can result in episodes of non-engagement with support services.

Due to the concerns about the number of individuals and households who are experiencing chronic homelessness, there is a need to consider the Housing Executive’s strategic response to the issue, particularly when a methodology is implemented to properly quantify the problem so resources are directed where they are needed and appropriate services are in place.

Chronic homelessness is a subgroup included in, but not limited to, the statutory homelessness population as not all those who experience chronic homelessness may be known to the Housing Executive. With this in mind it is vital that the Housing Executive engages with other statutory and voluntary partners to ensure such individuals are included in any data published on chronic homelessness.

Whilst we refer throughout the document to individuals experiencing chronic homelessness it is important to note individuals and households can be affected by chronic homelessness.

2 A Review of Single Homelessness in the UK 2000 – 2010 Anwen Jones and Nicholas Pleace, Crisis (2010)  
<https://www.york.ac.uk/media/chp/documents/2010/A%20Review%20of%20Single%20Homelessness%20in%20the%20UK%202000%20-%202010%20-%20summary.pdf>

## Chapter 2

# PURPOSE OF THIS DOCUMENT

This document was produced as a result of a commitment made by the Housing Executive in Ending Homelessness Together<sup>3</sup>, The Homelessness Strategy 2017-22, “to further understand and address the complexities of chronic homelessness across Northern Ireland.” It seeks to explore the extent and nature of chronic homelessness in Northern Ireland, the impact of this experience on their lives and how the Housing Executive can play its part in effectively addressing the issues surrounding chronic homelessness.

The purpose of this document is to outline the action that will be taken by the Housing Executive to address chronic homelessness through a range of activities contained in this action plan. The Housing Executive, with the support of other agencies, wishes to translate its commitments into activities, showing how the aims and objectives set out in this document will be met. A key priority is to build on the Rough Sleepers Strategies for which there are specific actions within this document.

The Housing Executive’s commitment to addressing the needs of those experiencing chronic homelessness is reinforced in the Homelessness Strategy 2017-22, Year 1 Annual Progress Report 2017-18<sup>4</sup>, where two of the actions within objective three have been combined. The actions to ‘Review and implement Belfast and Derry/Londonderry Rough Sleepers Strategy’ and ‘Identify chronic homeless need outside Belfast and Derry/Londonderry and devise appropriate action plan to tackle any issues’ have been incorporated in to an action to ‘Develop and implement a Chronic Homelessness Action Plan for Northern Ireland’.

Identifying chronic homeless need and devising an appropriate action plan has been progressed through the development of criteria by which the Housing Executive can identify the number of individuals in Northern Ireland experiencing chronic homelessness.

The Housing Executive will identify, through its engagement with homeless individuals and households, those who meet the defined criteria (outlined in Chapter 4) for chronic homelessness and for whom Housing First models may be appropriate. This analysis of homeless individuals and households will be extended to all offices across Northern Ireland in 2018/19 which will, in turn, inform the potential commissioning and/or grant funding of any future Housing First models.

This document has been prepared for formal consultation and will be subject to change as a result of consultation. While the Housing Executive will seek to develop appropriate service responses to the needs identified, this will be subject to funding availability.

The Housing Executive has listened to the sector and its concerns regarding addressing the needs of individuals who are experiencing chronic homelessness. The Housing Executive has completed a number of consultation exercises asking key questions around chronic homelessness including through the Homelessness Local Area Groups, Housing Solutions, service providers, community representatives and partner agencies in the voluntary and statutory sectors. Consultation has also taken place through the Central Homelessness Forum and at the launch of the Homelessness Strategy Annual Progress Report 2017-18.

The Chronic Homelessness Action Plan will complement the actions and priorities contained within the Inter-Departmental Homelessness Action Plan. The Inter-Departmental Homelessness Action Plan aims to identify and address service gaps for those at risk of homelessness and those who become homeless including chronic homeless individuals. The Inter-Departmental Homelessness Action Plan was developed most specifically for non-accommodation issues with input from the Department for Communities, Health, Justice and Education, statutory partners and homelessness service providers.

<sup>3</sup> Homelessness strategy for Northern Ireland 2017-22 NIHE (2017) [https://www.nihe.gov.uk/northern\\_ireland\\_homelessness\\_strategy.pdf](https://www.nihe.gov.uk/northern_ireland_homelessness_strategy.pdf)

<sup>4</sup> Homelessness Strategy 2017-22 Annual Progress Report 2017-18 NIHE (2018) [https://touch.nihe.gov.uk/homelessness\\_annual\\_progress\\_report\\_2017-18.pdf](https://touch.nihe.gov.uk/homelessness_annual_progress_report_2017-18.pdf)

## Chapter 3

# WHAT DO WE WANT TO ACHIEVE?

The Housing Executive wants to produce a Chronic Homelessness Action Plan which shows commitment to leading on addressing the issues of those individuals who are experiencing chronic homelessness in Northern Ireland.

There are a range of people who are experiencing chronic homelessness with significant complex needs and through the actions set out in the action plan the Housing Executive aims to quantify and reduce this number. There is a need to work collaboratively with partner agencies in order to achieve the aims and objectives of the action plan and to accomplish the vision of this document which supports the Homelessness Strategy's vision of Ending Homelessness Together.

Research indicates<sup>5</sup> that approximately 10% of homelessness applicants are experiencing chronic homelessness and therefore this is a problem that requires specific attention.

This document will support the vision of the Homelessness strategy 2017-22, and reflects that while inter-agency working is vital in the delivery of the Strategy it is even more important in addressing the needs of those who are within the chronic homelessness category. The Housing Executive has committed under Objective 3 'to further understand and address the complexities of chronic homelessness across Northern Ireland'. As has been noted in this document, engagement with the sector has identified the need to develop an action plan.

Key stakeholders have noted the importance of any action plan including an aim to introduce a methodology to identify chronic homelessness numbers and examine/provide appropriate housing models including Housing First models to meet the needs of those that are experiencing chronic homelessness. The Housing Executive want to see a range of joined up outreach and drop in services, and accommodation based services being targeted and delivered to those in need of appropriate service provision.

The aims of the action plan are to:

- Improve the measurement and understanding of the scale of the problem of chronic homelessness and establish a baseline.
- Promote early intervention and prevent homelessness.
- Support a rapid response to chronic homelessness to ensure interventions are effective and well-targeted.
- Promote a cross departmental and inter-agency approach to addressing the problem of chronic homelessness.

Objectives of this action plan are to:

1. Design specific criteria for measuring chronic homelessness and implement data collection arrangements.
2. Introduce mechanisms to monitor and report on chronic homelessness trends.
3. Utilise chronic homelessness data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision.
4. Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness.
5. Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment.
6. Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible.
7. Make the stay in temporary accommodation as short as possible.
8. Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as soon as possible.
9. Promote inter-agency issues and actions required to address chronic homelessness.
10. Ensure mechanisms are in place to implement and oversee the implementation of the Chronic Homelessness Action Plan.

<sup>5</sup> Applying Cluster Analysis to Test a Typology of Homelessness by Pattern of Shelter Utilization: Results from the Analysis of Administrative Data, Kuhn and Culhane (1998) <https://link.springer.com/article/10.1023/A:1022176402357>



# Chapter 4

## METHODOLOGY

This action plan began with a literature review which examined research findings and responses to chronic homelessness in Northern Ireland and neighbouring jurisdictions. This research was completed in conjunction with several tiers of consultation, engagement and collaborative working with practitioners to understand the issues. This is a document that has been developed by the Housing Executive listening to and engaging with the homelessness sector. This engagement will continue to be vital to ensure the effective implementation of the action plan.

### Consultation Process

As part of the development of this Chronic Homelessness Action Plan the Housing Executive has completed several consultation exercises with the sector with a view to identifying key issues that should be addressed. Consultation to date has included:

- Three Local Area Groups which focussed specifically on chronic homelessness. These groups were in South Antrim/Mid & East Antrim, South West and Mid-Ulster. These groups were chosen at random and the same issues were raised by all groups. Their views were ratified by other Area Groups.
- Following these meetings 140 practitioners across the statutory and voluntary sector were invited to submit written feedback on the issues raised during these meetings.
- Individual meetings have been carried out with a wide range of external stakeholders within the statutory and voluntary sectors. These providers include Extern, The Welcome Organisation, Simon Community NI, Depaul, First Housing Aid and Support Services, Queens Quarter and the Salvation Army.
- One to one meetings have also been held with internal stakeholders, including the Rural Unit, Belfast Housing Solutions and Support Team and Area Offices.
- Consultation has taken place through formal inter-agency structures such as the Research Advisory Group and the Central Homelessness Forum.

- As a result of these discussions, a document has been compiled detailing the issues raised by the sector under 2 headings, accommodation and non-accommodation based issues. This is with a view to considering how accommodation and non-accommodation based issues can be addressed as part of the Chronic Homelessness Action Plan or through existing inter-agency/inter-departmental delivery mechanisms. The sector was very clear on the need to deal with accommodation and non-accommodation based issues as part of the solution to dealing with those that are experiencing chronic homelessness.
- Follow up meetings were carried out around accommodation and non-accommodation based issues to ensure that the document fully reflects the views/concerns of the sector ascertained through previous consultation.
- Workshops on Chronic Homelessness Action Plan at the Homelessness Strategy Annual Report launch on 26th October 2018.
- Rural service user input was also sought via consultation with the Rural Community Network and Rural Residents Forum to ensure that local issues were fully considered.

The aims and objectives of the action plan are reflective of the views received during consultation, within the context and acceptance that chronic homelessness is not just a housing problem and can manifest itself across a range of individuals and households and in many forms. This action plan therefore requires commitment across all agencies and will seek to build on the work of the Inter-Departmental Homelessness Action Plan which has delivered a cross-departmental response to non-accommodation based issues within the Homelessness Strategy.

The sector has identified the need to develop a range of outreach, drop-in and accommodation-based services being delivered by housing, healthcare and support service providers. These need to be bespoke services which are widely available, easily accessible and provide a holistic approach to addressing the needs of those that are experiencing chronic homelessness.

It is recognised that in the absence of additional funding this may mean reprioritisation of spending on current services.

The accommodation based issues will be taken forward by this action plan whereas the non-accommodation based issues will be prioritised and addressed through the Inter-Departmental Homelessness Action Group. (See Appendix A for accommodation and non-accommodation based issues identified)

This Housing Executive led action plan is a 3 year plan, reviewed annually in conjunction with the Homelessness Strategy and updated to reflect new or changing priorities.

## Actions to date

To date, the Housing Executive has been unable to identify any authority within the UK with responsibility for homelessness which has provided indicators or triggers to specifically identify and report on individuals who are experiencing chronic homelessness. The Housing Executive, in conjunction with its partners, has developed criteria to define chronic homelessness so that going forward it will be possible to record the number of individuals who experience chronic homelessness in Northern Ireland.

The criteria identified as a result of the initial consultation for the development of this Action Plan are provided below and will be developed further as part of the next stage of public consultation.

An individual can be said to be experiencing chronic homelessness if they meet three or more of the criteria listed:

1. An individual with more than one episode of homelessness in the last 12 months (constant breakdown of tenancies).
2. An individual with multiple placements/exclusions from temporary accommodation.
3. An individual with mental health problems.
4. An individual with addictions e.g. drug user or alcohol addictions.
5. An individual that has engaged in street activity, including rough sleeping, street drinking, begging.
6. An individual prone to violence - risk to self, to others or from others.
7. An individual who has encountered the criminal justice system.

As a result of the development of the criteria to define chronic homelessness, outlined in more detail later in this action plan, each Housing Executive Area office was asked to estimate the number of individuals experiencing chronic homelessness within their Area with the knowledge that going forward the Housing Executive will put in place recording mechanisms that will allow an evidence baseline to be established. Based on criteria 1-6, each Area office was asked to identify the number of individuals experiencing chronic homelessness who are currently engaged with our organisation from their current records. This resulted in 473 individuals being identified. It should be noted that this was an estimate which in the main was based on limited data sources or was anecdotal and will therefore not be used as the evidence base going forward. Criterion number 7 was added to the list after this initial information gathering exercise was completed.

Based on research<sup>6</sup> conducted elsewhere it would be expected that between 5-10% of the homeless population could be identified as experiencing chronic homelessness. Given that over 22,000 full duty applicants were registered with the Housing Executive at the end of December 2018, it would not be unreasonable to assume between 1100 - 2200 of these individuals or households could be experiencing chronic homelessness.

Area	Chronic Homelessness number within Area
West Area	21
Causeway Area	17
Mid & East Antrim Area	28
South Antrim Area	28
North Down and Ards Area	50
South Down Area	34
South Area	6
Mid Ulster Area	39
South West Area	18
Belfast Housing Solutions	232
Total	473

It is intended that as part of the action plan the measurement of those experiencing chronic homelessness against these criteria will become an integral part of the data capture process on the first occasion they come into contact with the Housing Executive seeking assistance.

<sup>6</sup> Applying Cluster Analysis to Test a Typology of Homelessness by Pattern of Shelter Utilization: Results from the Analysis of Administrative Data, Kuhn and Culhane (1998) <https://link.springer.com/article/10.1023/A:1022176402357>



## Chapter 5

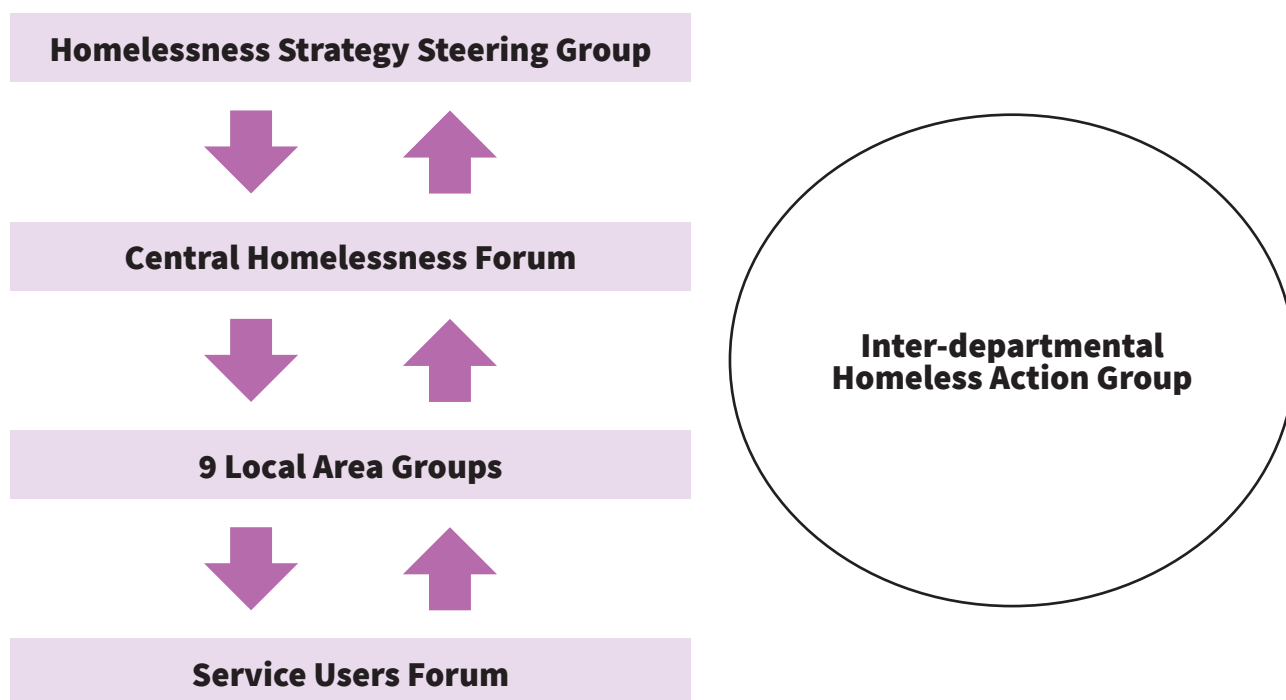
# HOW WILL WE TAKE THIS ACTION PLAN FORWARD?

The Housing Executive will work with the Department for Communities and all relevant stakeholders to ensure delivery of this action plan. As the Housing Executive develops more understanding of the problem and more evidence becomes available, including through the separate project to conduct a Strategic Review of Temporary Accommodation, the plan will be reviewed and amended to reflect this new information. The action plan will align with the Homelessness Strategy and therefore covers the years 2019-2022.

Upon completion of the consultation process this action plan will be submitted for formal approval to the Housing Executive's Board before a delivery process commences. The action plan delivery mechanism will run in parallel to existing Homelessness Strategy structures with links to the HSSG, Central Homelessness Forum, local area groups and service user forums.

Formal reporting against actions will be provided to the Central Homelessness Forum and the HSSG to enable them to monitor progress. There will also be a reporting mechanism published as part of the Homelessness Strategy Annual Report.

Strategy Delivery Mechanism –



## Chapter 6

# BACKGROUND - WHAT IS CHRONIC HOMELESSNESS?

### Definition of chronic Homelessness

The Homelessness strategy 2017-22 defines chronic homelessness using a definition from a Crisis Report 2010<sup>7</sup> “A Review of Single Homelessness in the UK 2000-2010” which notes a “group of individuals with very pronounced and complex support needs who found it difficult to exit from homelessness.”

Ending Homelessness Together - The Homelessness Strategy 2017-22 recognises that chronic homelessness is one group within the homelessness population. It cited the categorisations used by the European Conference on Homelessness<sup>8</sup> as follows:

- Transitional homelessness - households that enter the process, are assessed and rehoused and do not return to homelessness.
- Episodic or repeat homelessness - brought about by ongoing changes in circumstances and events.
- Chronic homelessness - long term users of emergency services, in particular rough sleepers.

The Housing Executive has, as a result of consultation, developed criteria to define chronic homelessness.

### Hidden homelessness

The Homelessness Strategy 2017-22 has noted concerns around hidden homelessness which included, “people living in a range of circumstances, for example, households that may be staying with friends or sharing with family because they have no accommodation of their own.”

The Homelessness Strategy has a clear focus on homeless prevention, this includes actions around:

- Identifying particular groups which are at the highest risk of homelessness.
- Assisting in the public’s understanding of the complex nature of homelessness.

- Raising awareness of homelessness to ensure households approaching crisis can access support.
- Undertaking pre-crisis intervention. This can take the form of advice and mediation services; proactive interventions and targeted services at known risk points.
- Preventing recurring homelessness, including ensuring tenancy sustainment is central to preventing repeat homelessness.

As part of the Homelessness Strategy, the Housing Executive has developed a Communication Action Plan and a training package which raises awareness of pre-crisis homelessness indicators.

The implementation of a Communication Action Plan aims to ensure households approaching crisis can access the right support quickly. The training package aims to ensure that key staff, initially within the Housing Executive but to be extended to other agencies, are aware of potential trigger signs for homelessness and have the knowledge of relevant support agencies to act accordingly. The Housing Executive will also be undertaking a range of other prevention activities as part of the Year 3 Implementation of the Homelessness Strategy.

### Accessibility for marginalised Groups

Accessibility for marginalised groups, for example persons from abroad is an ongoing issue. The Homelessness Strategy notes the difficulty that persons from abroad with no recourse to public funds have accessing benefits and services. This may apply to individuals who are experiencing chronic homelessness.

Article 6(D)1 of the Housing (Amendment) Act (NI) 2010 provides for free advice in relation to homelessness and the prevention of homelessness to be made available to all persons. This may include referring the applicant to other support agencies. This means that such free advice is available to persons subject to immigration control and other persons from abroad.

7 'A Review of Single Homelessness in the UK 2000 – 2010 Anwen Jones and Nicholas Pleace', Crisis (2010) [http://www.crisis.org.uk/data/files/publications/ReviewOfSingleHomelessness\\_Final.pdf](http://www.crisis.org.uk/data/files/publications/ReviewOfSingleHomelessness_Final.pdf)

8 Homelessness and Housing Policies in Europe: Lessons from Research, FEANTSA (the European Federation of Organisations Working with the Homeless) (2010) [http://www.feantsaresearch.org/IMG/pdf/fea\\_020-10\\_en\\_final.pdf](http://www.feantsaresearch.org/IMG/pdf/fea_020-10_en_final.pdf)

Where an applicant is ineligible for assistance under the Housing (NI) Order 1988 but they are destitute and have a pre-existing care need [a pre-existing care need, this may be similar to circumstances outlined in the priority need categories in Article 5 of the Housing (NI) Order 1988], they may be referred to Social Services under the Health & Personal Services (NI) Order 1972.

Furthermore, Health and Social Care Trusts have a duty under the Children (Northern Ireland) Order 1995 to provide a range of services for persons under 18 who are children in need. Therefore, a referral can be made to the relevant Health and Social Care Trust in such instances.

## **Inter-Departmental Homelessness Action Plan**

The Inter-Departmental Homelessness Action Group involving the Departments for Communities, Health, Justice and Education will produce a second outcome centred action plan to support the needs of the homelessness population in Northern Ireland. A number of their commitments have been referred to in this action plan.

The first Inter-Departmental Homelessness Action Plan was published in November 2017 and focussed on addressing gaps in services that have the most impact on those who are experiencing chronic homelessness, homeless or most at risk of homelessness. The plan was developed with other government departments, statutory partners, homelessness service providers and service users. Year 1 of the action plan contained nine actions which have been identified as priorities for all departments and agencies involved.

The Inter-Departmental Homelessness Strategy Steering Group (HSSG) which meets quarterly will oversee implementation of the Homelessness Strategy and the Inter-Departmental Homelessness Action Plan. It endorsed the Year 1 Homeless Strategy Implementation Plan and the Year 1 Homelessness Inter-Departmental Action Plan.

There is an indicative link between each of the Inter-Departmental Homelessness Action Plan's priorities and those actions identified as part of the Chronic Homelessness Action Plan consultation. Going forward further development of these links may be worthwhile.

# Chapter 7

## ROUGH SLEEPING

### **Belfast Area Rough Sleepers Strategy 2004-2006**

The Housing Executive's commitment to dealing strategically with Rough Sleepers is not a new concept. The Housing Executive gave a commitment to dealing with street homelessness in Belfast. This resulted in the establishment of an inter-agency Rough Sleepers Forum which produced a Belfast Area Rough Sleepers Strategy 2004-2006. This provided an opportunity for the Housing Executive and the statutory and voluntary sectors to provide a focussed approach to addressing the problems faced by rough sleeping through more than just a housing response.

This led to the introduction of local inter-agency structures and a new range of specialist provision which included; Multi-disciplinary Homeless Support Team (MDHST), provision of Crash beds, low threshold harm reduction service (wet hostel), a range of generic singles hostels across the City, Street outreach and a drop in service. It was also envisaged that the successful implementation of the Belfast Area Rough Sleepers Strategy would lead to consideration as to how the services could be replicated across other areas.

The actions identified as part of the strategy provided the foundations to deal with rough sleepers. Those actions implemented have evolved and are continually being built upon by the Housing Executive and partner agencies.

### **The Rough Sleepers/Street Drinkers Strategy for Derry City 2009**

The Rough Sleepers/Street Drinkers Strategy for Derry City 2009 was launched in order to deal with the issue of people who were sleeping rough and/or drinking in and around Derry/Londonderry City centre. Its main objective was to ensure that there was appropriate preventative and responsive housing support and care services in place for those who were sleeping rough and those at risk of homelessness due to alcohol addiction in the city.

It identified a number of services including generic homeless hostels, specialist alcohol accommodation, drop in facilities and housing with care provision

required within the inner city. The strategy identified 2 key themes; a number of services were not strategically relevant in their current form and required adaptation and there was a need to develop inter-agency strands in relation to establishing effective pathways between services to meet the needs of service users.

The strategy proved to be successful as many of its service recommendations are still operating today.

### **Street Needs Audit 2015-16**

Street activity has remained a cause for concern and as a result a Street Needs Audit was undertaken by Depaul and the Welcome Centre on behalf of the Housing Executive, over 12 weeks in 2015, to quantify street activity and rough sleeping. The audit showed that visible rough sleeping levels remain low in Belfast city centre, averaging 6 people per night with 361 individuals engaged in 'street activities' i.e. drinking, begging or sleeping over the course of the audit. The audit took countenance of the distinction between "actual homelessness, episodic rough sleeping and public intoxication." The exercise also identified seven individuals classed as 'entrenched rough sleepers',

The Belfast Street Needs Audit<sup>9</sup> report January 2016 identified the main barriers to accessing services identified by homeless individuals:

- Problems with other residents, including drug and alcohol use, violence, theft, bullying, noise and arguments and feeling unsafe.
- Substance users making it difficult for other individuals to tackle their own substance misuse.
- Overcrowding, a lack of bed spaces.
- Rules, in particular around curfews were considered unnecessarily restrictive.

The stakeholders who carried out the audit identified there was a larger group engaging in street drinking and street begging and a multi-agency approach was needed to address this issue. The report recommended the implementation of a case management approach to rough sleepers

9 BELFAST STREET NEEDS AUDIT, Northern Ireland Housing Executive, The Welcome Organisation and Depaul, Belfast City Centre Management Final Report, NIHE (January 2016) [https://www.nihe.gov.uk/belfast\\_street\\_needs\\_audit.pdf](https://www.nihe.gov.uk/belfast_street_needs_audit.pdf)

and the re-evaluation of service provision in Belfast including capacity and responsiveness of services to meet clients needs. A key recommendation was for information sharing protocols to be agreed to ensure that organisations working with those at risk of rough sleeping have access to relevant and appropriate information.

## Tri- Ministerial Action Plan

The Homelessness Monitor 2016<sup>10</sup> noted the success of the Tri-ministerial Action Plan bringing together the Ministers for Social Development, Health and Social Care, and Justice, as a result of issues regarding rough sleeping.

The action plan identified short term, medium term and long term actions. Many short term recommendations related to housing and homelessness services, such as extension of the outreach service and increasing the number of emergency beds.

Longer term actions included service providers in Belfast re-examining access arrangements to hostels and their model of service delivery to improve access for vulnerable users and development of arrangements /protocols between agencies to provide an effective and efficient service, for example between the Housing Executive and the PSNI to ensure that individuals being released from police custody are signposted effectively to services.

The action plan provided a constructive framework for engagement with health and justice departments and cross-departmental working in its delivery. The Housing Executive is hoping to build on this level of co-operation in the delivery of the Chronic Homelessness Action Plan.

## NIAO Report on Homelessness

The Northern Ireland Audit Office (NIAO) Report on Homelessness is relevant to this action plan as it makes a specific recommendation in relation to rough sleepers. Rough Sleeping can be classed as a sub group within chronic homelessness.

Recommendation 9 of The NIAO Homelessness Report recommends, “that the NIHE in partnership with other service providers, develop improved systems for regularly monitoring and measuring the extent of rough Sleeping throughout Northern Ireland to determine if action currently being taken is adequate.”

## Street Counts

As part of the commitment to achieving the NIAO recommendation, the Housing Executive and partner organisations carried out rough sleeper street counts in Belfast, Derry/Londonderry and Newry during November 2018. The methodology for the street counts is broadly similar to the process followed by Local Authorities in England, Scotland and Wales and therefore consistent with data submitted to the Ministry of Housing, Communities and Local Government. During the street count rough sleepers were identified using the definition below:

People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places, not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or ‘bashes’).

In areas where the need for a street count was not identified the Housing Executive used an estimate to identify the number of rough sleepers. In order to gather this data the Housing Executive contacted local partners, including the PSNI, asking for the Housing Executive to be notified of any rough sleepers on the night of Wednesday 28th November 2018. As with the rough sleeper street counts this is again consistent with the approach taken in neighbouring jurisdictions.

It is important to emphasise that the purpose of the street counts and estimate is to determine the numbers of people rough sleeping on the typical night chosen, rather than a larger sample of street activity, hidden homelessness or people using homelessness services. This means that, for example, a person who sometimes sleeps rough but sometimes has accommodation/shelter will not be included in the estimate unless there is evidence that they did sleep rough on that night. In previous years the Housing Executive have not provided any estimates of rough sleepers beyond those identified during the street counts in the larger cities and the purpose of this exercise is to provide a snapshot of rough sleeping activity in smaller settlements/rural areas.

The recent street counts and estimates identified a total of 38 rough sleepers across Northern Ireland. The Housing Executive is committed to carrying out this exercise on an annual basis as part of this action plan.

<sup>10</sup> The Homelessness Monitor NI Crisis (2016)  
[https://www.crisis.org.uk/media/236838/the\\_homelessness\\_monitor\\_northern\\_ireland\\_2016.pdf](https://www.crisis.org.uk/media/236838/the_homelessness_monitor_northern_ireland_2016.pdf)

## **Ending Homelessness Together - Homelessness Strategy for Northern Ireland 2017-22**

Although there has been a lot of positive work carried out as a result of previous strategies in terms of provision of support services and inter-agency work, Ending Homelessness Together, The Homelessness Strategy 2017-22 identifies the need to further investigate and research the needs of people who are experiencing chronic homelessness of which rough sleeping can be classed as a subgroup.

In relation to the action within the Strategy to “review and implement Belfast and Derry/Londonderry Rough Sleepers Strategy” the Housing Executive has engaged with a wide range of stakeholders on the issue of rough sleeping and chronic homelessness during 2017/18.

Historically, NI has had very low levels of rough sleeping by comparisons to other jurisdictions and our engagement with statutory and voluntary sectors, particularly through the Local Area Groups, has noted the need to focus on a broader scope of chronic homelessness. As a result this action from the strategy has been amended to ‘Develop and implement a Chronic Homelessness Action Plan for Northern Ireland’.

The Homelessness Strategy includes an action to devise appropriate housing models for those who are experiencing chronic homelessness including rough sleepers. This has been progressed through the development of criteria by which the Housing Executive can identify the number of homeless applicants in Northern Ireland experiencing chronic homelessness. This will involve Housing Solutions teams gathering information on clients who may fall within the chronic homelessness category. In such cases there can be multiple failed temporary accommodation placements and Housing First models may be considered as the appropriate response to deliver a sustainable housing solution.

## Chapter 8

# STRATEGIC CONTEXT- NORTHERN IRELAND

The UK government has a legal responsibility for homelessness which varies across the 4 jurisdictions; England, Scotland, Wales and Northern Ireland. Councils have this responsibility in England, Wales and Scotland, while in Northern Ireland the Housing Executive has this responsibility. Each region has a slightly different approach, but in general the authorities have a duty to provide temporary and/or permanent accommodation if after investigations they meet the homelessness tests. They have to meet the eligibility criteria including as a person from abroad, are accepted as homeless, are in a priority need category, (except in Scotland), and haven't become homeless intentionally (which is optional for councils in Wales).

In Northern Ireland the Housing (NI) Order 1988 as amended by the Housing (NI) Order 2003 ('the 2003 Order'), and the Housing (Amendment) Act (NI) 2010 ('the 2010 Act') places a statutory duty on the Housing Executive to assess and investigate homelessness applicants and where appropriate provide temporary and/or permanent accommodation.

In order to be "accepted" as statutorily homeless, a household must meet the four tests of:

- Eligibility;
- Homelessness;
- Priority Need;
- Intentionality.

The Housing (Amendment) Act (NI) 2010 ('the 2010 Act') introduced a new duty on the NIHE to provide advice on homelessness and its prevention to anyone in Northern Ireland who requested it.

Homeless service delivery is different in GB compared to NI as local authorities (local government) have responsibility for a wide range of services. In England local councils are the most common type of local authority and are responsible for a range of vital services including social care, schools, housing and planning. Combined Authorities exist where two or more councils collaborate and take collective decisions across council boundaries such as Greater

Manchester Combined Authority. Due to the local authority structure in England, integration of services is much easier compared to Northern Ireland where a diverse range of services fall under the remit of different government departments and therefore different implementation bodies.

The Homelessness Monitor NI 2016 identified three new emerging themes in NI, 'Housing Solutions and Support' approach to homelessness prevention by the NIHE, developments with regard to rough sleeping, begging and street drinking in Belfast; and a Housing First pilot project in Northern Ireland. These themes indicate the direction of Housing Executive policy regarding those deemed to be experiencing chronic homelessness.

### NI Based Temporary Accommodation Research

Research conducted by Lynne Mc Mordie through I-SPHERE / Oak Foundation Internship Programme at Herriot Watt University was published in July 2018. The research "Chronic Homelessness and Temporary Accommodation Placement in Belfast,"<sup>11</sup> looked at the provision and design of temporary accommodation services in Belfast and its use by individuals who have experienced chronic homelessness.

This research refers to a sub-group within the Northern Ireland homeless population who experience repeated temporary accommodation placements, periods of rough sleeping and other forms of homelessness and questions the efficiency of current service provision in resolving homelessness for those with more complex needs. The research also found that this group of homelessness people suffer marginalisation at every stage in the service provision and this is further compounded when they fail to secure independent living.

The research suggests that service users adopt a range of coping mechanisms to reduce the stresses of living in a hostel which in turn exacerbates their circumstances and results in placement failure. This adds to the perpetual cycle of homelessness which in

11 Chronic Homelessness and Temporary Accommodation Placement in Belfast, Lynne Mc Mordie, Heriot-Watt University, I-SPHERE, Oak Foundation (July 2018)  
<https://ihurerblog.files.wordpress.com/2018/07/chronic-homelessness-and-temporary-accommodation.pdf>



turn will lead to deterioration of physical and mental health and increased risk of encounters with the criminal justice system.

This cycle of repeat homelessness reduced the possibility for tenancy sustainment and permanent rehousing, as people become institutionalised with decreased independent living skills and social isolation.

While this report recommends the implementation of a Chronic Homelessness Action Plan, it was agreed that the Housing Executive would pursue an action plan in March 2018. The Housing Executive's commitment preceded this report and the Housing Executive is pleased that the need was identified as a priority.

The report also recommended moving away from hostel forms of temporary accommodation and toward Housing First and housing-led forms of provision for this particular sub group of homeless individuals. The research also recommends that strategies, action plans and reviews, by the NIHE and DFC, in relation to housing and homelessness, should take cognisance of their impact on chronic homelessness and should include prevention as a key theme. The report's final recommendation is the development of a framework to monitor sustainable exits from temporary accommodation and homelessness.

Further details on the Strategic context - UK , wider context and a sample of good practices can be found in Appendix B of the appendices

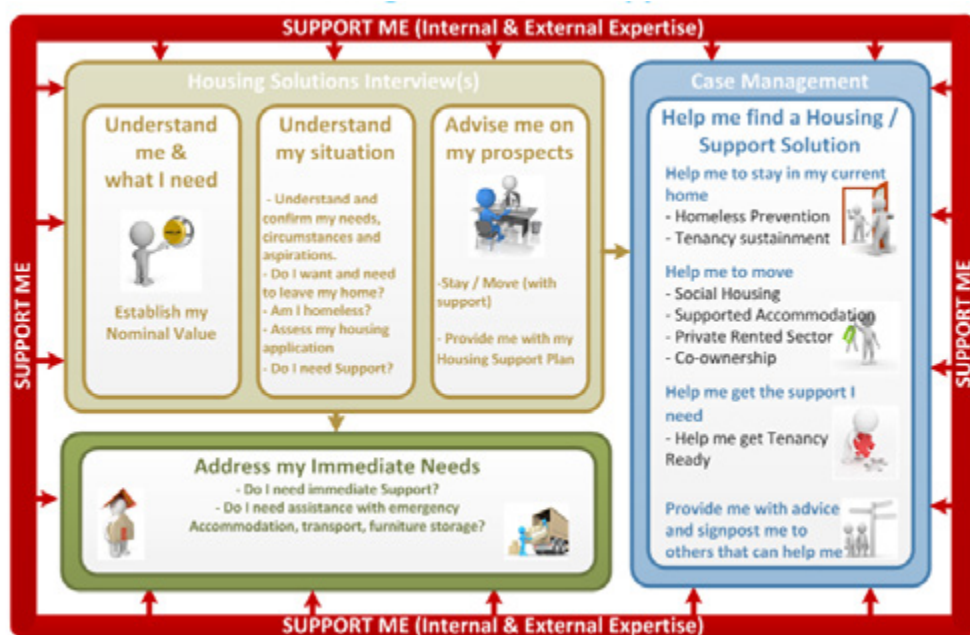
## How the Housing Executive is structured

In 2014 the Housing Executive undertook a major review of front line service delivery and as a result developed a Housing Solutions and Support model for its housing customers. The Housing Executive's aim is to offer effective, relevant housing advice and information at the earliest possible stage which will let our customers make choices about which options are best for them. This includes work to prevent and respond effectively to homelessness.

The Housing Solutions and Support approach was rolled out across Northern Ireland from April 2018. There are currently 150+ Housing Advisors delivering the Housing Solutions and support service across Northern Ireland. Housing Solutions in Belfast is delivered from a Belfast Regional Housing Solutions team based in Great Victoria with outlets in Shankill, Diaryfarm, Lisburn and Dundonald. Housing Solutions outside of Belfast is delivered by the 9 Area Offices, whilst some teams are based in the Area Office the Housing Solutions and Support approach is delivered across all outlets.

The aim is to provide person centred services which are tailored to meet the needs of individual customers and support them to achieve sustainable housing solutions with an emphasis on homelessness prevention where possible. The model aims to provide good quality advice and assistance, working in partnership with statutory and voluntary agencies and promotes the use of floating support services to prevent homelessness.

## Housing Solutions and Support Team Structure



Further details on Housing Executive measures, data collection, outcomes and service providers funded can be found at Appendix C.



## Chapter 9

# BUDGETS AND FUNDING

The Housing Executive receives its funding for homelessness services from the Department for Communities. In contrast local authorities in England, Scotland and Wales receive their funding from a number of sources, including Government grants, council tax, fees and charges. In England, Government grants are provided to fund specific services, for example, implementation of Housing First model or implementation of the Homelessness Reduction Act.

In 2017/18 the Housing Executive provided total funding of approximately £37.1m for homeless services across Northern Ireland, with figures listed below:

- £4.968m on temporary accommodation, including DIME (Dispersed Intensively Managed Emergency).
- £1.718m for storage of personal belongings.
- £2.84m on outside agencies in the voluntary sector.
- £27.6m on Supporting People funding of homelessness services.

The Housing Executive will undertake to examine current service provision and identify future needs of those who are experiencing chronic homelessness. They will consider the associated service and funding requirements. This will include, but not be exclusive to:

- Considering SP commissioning and/or grant funding arrangements and specifically the associated priorities in the SP Strategy for the Homelessness theme.
- Considering the findings of the Strategic review of temporary accommodation;
- Considering mechanisms for ensuring affordable housing supply.
- Identifying funding requirements and options for pilots/initiatives.
- Identifying innovative solutions to funding and service requirements.
- Reviewing legislation to ensure it is flexible and appropriate to meet current needs.

There will be associated budgetary implications with a number of the activities identified to deliver the aims of the action plan. Those actions which will require additional resources have been clearly identified in the draft plan. The budgetary requirements for the delivery of the plan will be finalised following consultation.

However, for certain key activities identified, the funding requirements would be considerable, including for example:

- A dedicated programme of prevention activity.
- The extension of support services to help people maintain their accommodation.
- The expansion of Housing First models in Northern Ireland.

### Supporting People

The Supporting People budget has been protected in Northern Ireland since 2008 unlike in other parts of the UK. A recent Supporting People review<sup>12</sup> recommended moving away from primarily accommodation-based provision to more floating support models. This is in keeping with the support for Housing First models. The new structures will engage in planning on a cross agency basis to develop services that are strategically aligned with the Homelessness Strategy.

Approximately 37% of the current SP budget (£72.8m) is allocated to services for Homeless clients. Approx. 120 distinct services across NI are funded through SP, the majority being the traditional temporary accommodation based hostel model. Additionally, there are 24 floating support services. The range of sub groups (or primary client groups) supported through these services are Homeless Families, Women at risk of domestic violence, Offenders/people at risk of offending, single homes and people with alcohol/drug problems.

The majority of those individuals described as experiencing chronic homelessness would be referred or self-refer into the single homeless/ alcohol/drug categories. This subset accounts for about half of all SP funded homeless services. Their services are performance managed through the SP contract

12 DSD (2015) Supporting People Review Final Report. Belfast: DSD; DSD (2016) Action Plan for the Implementation of the Supporting People Review. Belfast: DSD

management framework, which includes monitoring of occupancy, turnover and quality assessment.

In addition to ongoing monitoring of these areas, SP have as of 2018/19 introduced an outcomes framework which over time will provide meaningful data to inform future service configuration. A relatively new model which is currently in operation on a small scale in Belfast and Derry/L'Derry is Housing First. There is evidence to support that this model is effective with chronic homeless and the potential for further rollout is subject to availability of funding, access to housing and also a strategic approach to reconfiguration of existing hostel models.

## Chapter 10

# VISION/AIMS/OBJECTIVES

The Chronic Homelessness Action Plan will align with the Homelessness Strategy 2017-22 and covers a three year period from April 2019 to March 2022. In setting out the vision, aims and objectives of this action plan, it is important that this action plan supports the objectives and actions identified in the Homelessness Strategy. It is also critical to ensure that it is inclusive of our partners across the statutory, voluntary and community sectors and that our visions, aims and objectives are reflective of this, within the context and acceptance that chronic homelessness is not a problem that housing alone can address.

The needs of individuals who are experiencing chronic homelessness are wide ranging. It is therefore imperative that housing provision and support services are tailored to meet the needs of each individual appropriately.

Being at the sharpest end of the homelessness spectrum can mean that someone is forced to sleep rough. However, it is critical to remember that rough sleepers make up a relatively small proportion of the overall number of people who are experiencing chronic homelessness and the actions within this plan are mindful of that.

The objectives have been developed in an attempt to capture the actions to prevent rough sleeping and other street activity; empower frontline services to improve access to suitable housing solutions; strengthen inter-departmental co-operation and develop a measurement framework based on outcomes.

### Vision

The vision of this document will support the Homelessness Strategy's vision of **Ending Homelessness Together**.

This action plan will support this vision. If the Housing Executive is to address chronic homelessness, the Housing Executive will need to continue to work collaboratively with its stakeholders across the statutory, voluntary and community sector. This action plan shows the Housing Executive's commitment to introducing new ways of working as well as supporting a range of cross-government initiatives which will see us working collaboratively in the best interests of those experiencing chronic homelessness. The Housing Executive is constantly seeking to improve our

engagement with the sector and that engagement has been vital in identifying the aims and objectives for the Chronic Homelessness Action Plan and helping identify appropriate actions.

### Aims

In order for the Housing Executive to fulfil its ambition of ending chronic homelessness it must understand what the problem is and what the scale of it is. As a result the Housing Executive aims to develop a methodology to improve data collection on potential risk factors for chronic homelessness in order to improve understanding of the issues and complexities surrounding chronic homelessness and the scale of the problem. The Housing Executive will use this information to ensure that it promotes early interventions that can prevent homelessness and ensure interventions are effective and well-targeted to ensure that anyone who falls into chronic homelessness is very quickly given the right type of support. This will in turn support the vision of this action plan to end homelessness.

As previously noted, it is accepted across the sector that chronic homelessness is not just a problem that housing alone can resolve. It requires collaborative working with colleagues across the statutory, voluntary and community sectors and that our final aim is reflective of this in this action plan.

The Homelessness Strategy identified two actions relevant to chronic homelessness:

- Review and implement Belfast and Derry/Londonderry Rough Sleepers Strategy.
- Identify chronic homeless need outside Belfast and Derry/Londonderry and devise appropriate action plan to tackle any issues.

With the agreement of the HSSG and Central Homelessness Forum these two actions are both incorporated into this action plan.

The aims of the action plan are to:

1. Improve the measurement and understanding of the scale of the problem of chronic homelessness and establish a baseline.
2. Promote early intervention and prevention of chronic homelessness.
3. Provide a rapid response to chronic homelessness to ensure interventions are effective and well targeted.
4. Promote a cross-departmental and inter-agency approach to addressing the problem of chronic homelessness.

## Objectives

The 10 objectives were developed to support and enhance the 4 aims in relation to dealing with the problems of those individuals who experience chronic homelessness.

- Aim 1 has 3 linked objectives.
- Aim 2 has 2 linked objectives.
- Aim 3 has 3 linked objectives.
- Aim 4 has 2 linked objectives.

All objectives should have outcomes. This action plan has aligned to the outcomes set out in the Homelessness Strategy, where at the end of the process an individual should be in the position to say:

- “We have support that prevents us from becoming homeless;”
- “We live in Suitable homes”
- “We have the support we require to access and/or sustain a home”

A wide range of actions have been included in this action plan to meet the 10 key objectives, including developing a measurement framework which is used to inform future policies and actions and for which outcome based results will be evaluated. The outcomes will be measured to gauge progress.

## Objectives linked to Aim 1

1. Design specific criteria for measuring chronic homelessness and implement data collection arrangements.

The outcome will be to understand the scale of chronic homelessness and its causes, which will help the Housing Executive and its homeless sectorial partners take appropriate targeted action to reduce the prevalence of chronic homelessness.

2. Introduce mechanisms to monitor and report on chronic homelessness trends.

The outcome will be to understand the scale of chronic homelessness and its causes. The Housing Executive and its partners in the homeless sector will then be able to prioritise resources to target services at those most at risk, reduce repeat homelessness and achieve higher levels of tenancy sustainment.

3. Utilise chronic homelessness data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision.

The outcome will be the monitoring /development of existing and new legislation, policies and services. This will assist in the analysis of trends to inform legislation, service review, funding and commissioning and/or grant funding.

## Objectives linked to Aim 2

4. Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness.

The outcome will be the development and, implementation of formalised joint working arrangements to identify those at risk of chronic homelessness. This will assist in targeting those at greatest risk in order to prevent chronic homelessness

5. Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment.

The outcome will be an improved range of housing options to prevent homelessness.

### Objectives linked to Aim 3

6. Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible.

The outcome will be the provision of rapid assessment and support planning. This will assist in improving engagement and the reduced possibility of individuals becoming chronically homeless.

7. Make the stay in temporary accommodation as short as possible

Actions will be implemented to reduce the length of stay of temporary accommodation through the delivery of alternative options that are sustainable and provide appropriate support solutions for individuals and households who are affected by chronic homelessness.

8. Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as soon as possible

Actions will be implemented to increase the provision of the right type of accommodation and support for individuals and households who are affected by chronic homelessness.

### Objectives linked to Aim 4

9. Promote inter-agency issues and actions required to address chronic homelessness.

Actions will be implemented to improve the services delivered to individuals and households who are affected by chronic homelessness

10. Ensure mechanisms are in place to monitor and oversee the implementation of actions contained within the Chronic Homelessness Action Plan.

Arrangements will put in place to ensure the actions taken to deliver the are monitored, reviewed and evaluated against the overall aims of the Plan.

## Chapter 11

# 3 YEAR PLAN 2019-22

This Housing Executive led action plan will be a 3 year plan, reviewed annually in conjunction with the Homelessness Strategy.

### Action Plan – Year 1

#### What are we going to do?

#### Objectives

1. Design specific criteria for measuring chronic homelessness and implement data collection arrangements.
2. Introduce mechanisms to monitor and report on chronic homelessness trends.
3. Utilise chronic homelessness data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision.
4. Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness.
5. Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment.
6. Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible.
7. Make the stay in temporary accommodation as short as possible
8. Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as soon as possible
9. Promote inter-agency issues and actions required to address chronic homelessness.
10. Ensure mechanisms are in place to implement and oversee the implementation of the Chronic Homelessness Action Plan

### Objective 1 - Design specific criteria for measuring chronic homelessness and implement data collection arrangements

#### Development of criteria of Chronic Homelessness

In order to understand the issues and complexities surrounding chronic homelessness the Housing Executive has set out to gather as much evidence and information as possible about potential risk factors. The Homelessness Local Area Groups were consulted on the definition of chronic homelessness and broadly agreed that it required an enhanced interpretation through the development of a range of potential risk factors or criteria which in combination would identify the person or household as experiencing chronic homelessness. After the initial criteria were determined other homeless sector organisations were consulted. There was broad acceptance of the criteria whilst recognising that it was difficult to deliver a definition that was adequate to cover all statutory and voluntary organisations that provide services to individuals who are experiencing chronic homelessness.

The identified criteria are outlined below.

An individual can be said to be experiencing chronic homelessness if they meet **three or more** of the criteria listed:

1. A homelessness individual with more than one episode of homelessness in the last 12 months (constant breakdown of tenancies).
2. A homelessness individual with multiple placements/exclusions from temporary accommodation.
3. An individual with mental health problems.
4. An individual with addictions e.g. drug user or alcohol addictions.
5. An individual that has engaged in street activity, including rough sleeping, street drinking, begging.
6. An individual prone to violence-risk to self, to others or from others.
7. An individual who has encountered the criminal justice system.

Meeting three or more criteria was determined as the appropriate benchmark to identify an individual or household as experiencing chronic homelessness, so that the definition was neither too broad nor too restrictive in its application. Consultation reflected positively on this decision. As part of the ongoing consultation for the Action Plan, these criteria will be further developed to ensure there is a clear understanding of their applicability to individuals or households and ensure consistency in their collection and reporting.

### **Chronic homelessness baseline measurements**

Based on criteria 1-6, each Housing Executive Area office was asked to identify the number of individuals experiencing chronic homelessness who are currently engaged with our organisation from their current records or anecdotal information. This resulted in 473 individuals being identified. Criterion no. 7 was added to the list after this initial information gathering exercise was completed.

It should be noted that this was an estimate which in the main was based on limited data sources or was anecdotal and will therefore not be used as the evidence base going forward.

Based on research<sup>13</sup> conducted elsewhere it would be expected that between 5-10% of the homeless population could be identified as experiencing chronic homelessness. Given that over 22,000 full duty applicants were registered with the Housing Executive at the end of December 2018, it would not be unreasonable to assume between 1100 - 2200 of these individuals or households could be experiencing chronic homelessness.

### **Other Actions under Objective 1**

Going forward the Housing Executive will improve data collection by determining what information needs to be collected and retained within existing IT systems. This may include information recorded on HMS (Housing Management System which holds all customer information regarding housing, homelessness and tenancies) and CMS (Customer Management System which captures information on the number, method, frequency, time and nature of the demands placed on our service by customers) and consider any amendments needed to the systems to collect, retain and analyse this information. We also need to understand the limitations of the data collection processes so that we can try to improve them. This is particularly in the ability for data systems to be cross referenced between organisations.

The Housing Executive will conduct annual street counts in Belfast, Derry/Londonderry and other towns/cities to understand the scale of rough sleeping in Northern Ireland and will use this information as another method of measuring the scale of chronic homelessness.

Subject to funding the Housing Executive would intend to identify chronic homelessness numbers collectable by other agencies using the new standard indicators developed by the sector. Data will initially be collected by the Housing Executive's Housing Solutions and Support staff but this will be expanded to include data from other sources and other agencies in order to track customer journeys across agencies.

Linked to Objective 1, The Housing Executive would intend to take the opportunity to conduct Belfast and Derry/ Londonderry street audits and explore the potential of carrying out a Newry street audit which would result in a more comprehensive understanding of the scale of street activity including rough sleeping across urban areas in Northern Ireland.

The Housing Executive would intend to commission further research to understand the scale and specific impacts of chronic homelessness for specific groups including on women and poly drug users.

The outcome of this objective would be to understand the scale of chronic homelessness that is presented to the Housing Executive and in turn identify potential service gaps. This will provide an evidential basis to consider current and future service provision. Over time it will also enable the Housing Executive and its partners to measure the success of the action plan in terms of reducing the prevalence of chronic homelessness.

### **Objective 2 - Introduce mechanisms to monitor and report on chronic homelessness trends**

The Housing Executive will develop reports to identify trends in relation to chronic homelessness based on the data collected initially internally but ultimately across all relevant agencies. This information will be used to determine the prevalence or incidence of particular risk factors for chronic homelessness which will in turn help to inform service review and development. This will lead to a better understanding of the scale of chronic homelessness and how it is changing over time.

The Housing Executive intends to develop reports to identify trends in relation to chronic homelessness from data collected by all agencies to help inform

13 Applying Cluster Analysis to Test a Typology of Homelessness by Pattern of Shelter Utilization: Results from the Analysis of Administrative Data, Kuhn and Culhane (1998) <https://link.springer.com/article/10.1023/A:1022176402357>



strategic planning. Systems must be able to track customers across services so that data is not duplicated when being reported. The Action for Year 1 will be to explore options for the implementation of joint data capture arrangements from objective 1. This would improve the understanding of the scale of chronic homelessness across all agencies.

An integral part of the review of current service provision and the consideration of future housing models will be to collect and reflect on the views of service users. Actions include exploration of the issues with the existing Service User Forum and to identify other mechanisms for capturing service users' experiences. This will include gathering feedback from people who have used homeless services across Northern Ireland to find out more about their experiences of accessing services and finding accommodation. This will help inform the development of appropriate service responses.

The Housing Executive also proposes to review the incidences of and reasons for repeat homelessness in depth. This will look at causes and trends in relation to repeat homelessness and develop actions to address underlying issues. Consequently, action can be taken to target those most at risk, reduce repeat homelessness and achieve higher levels of tenancy sustainment.

Ultimately, the systematic collection and interpretation of data should greatly improve our ability to understand homelessness in Northern Ireland. This understanding of homelessness trends will then have implications both for national policy and for policymakers and practitioners at the operational level.

### **Objective 3 - Utilise chronic homelessness data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision**

Objective 3 sets out how the Housing Executive will seek to interpret chronic homelessness data and trends, along with other key statistical and qualitative information to monitor the impacts of legislative or policy developments and service commissioning and/or grant funding decisions on homelessness in Northern Ireland.

The Housing Executive will use the interpretation of data and trends to consider strategic, policy and operational impacts.

The Housing Executive will use data collected on chronic homelessness and indicators to target prevention. Data collected will be reviewed to identify

particular groups which are at the highest risk of chronic homelessness and seek to prioritise the pathways and interventions needed to prevent this outcome for particular groups.

In order to meet this objective, the Housing Executive and its partners should have data collection and analysis arrangements which provide an evidence-informed framework within which sector-led solutions can be joined up in a coordinated effort to address homelessness. This should be placed in the broader context of legislative and policy development as well as service commissioning and/or grant funding.

### **Objective 4 - Develop mechanisms across agencies for early identification of those who are at risk of homelessness or chronic homelessness**

The Housing Executive aims to develop mechanisms, through inter-agency working for early identification of those who are at risk of homelessness or chronic homelessness and take preventative action.

The Homelessness Strategy has a clear focus on homeless prevention, this includes actions around:

- Identifying particular groups which are at the highest risk of homelessness
- Assisting in the public's understanding of the complex nature of homelessness.
- Raising awareness of homelessness to ensure households approaching crisis can access support.
- Undertaking pre-crisis intervention. This can take the form of advice and mediation services; proactive interventions and targeted services at known risk points.
- Preventing recurring homelessness, including ensuring tenancy sustainment is central to preventing repeat homelessness.

This action plan seeks to promote prevention and early intervention through a number of initiatives. The Housing Executive is keen to raise awareness of prevention through early intervention, by identifying potential risk indicators including how adverse childhood experiences (ACEs) can be used as a chronic homelessness indicator. An Action for Year 1 of the action plan is to focus on working with Health & Social Care to review research and understand its application to homelessness prevention.

The Housing Executive seeks to address the needs of particular groups on an inter-agency basis through the review of protocols relevant to young people, prisoners, hospital discharge and care leavers in order to consider how to improve outcomes for relevant individuals including in relation to sustainable housing options prior to discharge/release. This should result in a reduction in homeless presentations following discharge.



The Housing Executive supports the need to improve accessibility for marginalised groups including advice to persons from abroad who are ineligible for housing assistance. The Housing Executive wishes to work collaboratively with other agencies to establish methods to identify this group. There are a number of areas where improvements are essential including exploring methods of improved data collection across all agencies and ensuring all staff members are trained to provide advice and assistance to this group. This should result in improved sharing of information of numbers of persons from abroad who are ineligible for housing assistance across agencies and more effective targeted advice for marginalised groups

The Housing Executive is committed through the Homelessness Strategy to promoting public awareness regarding support, advice and assistance for marginalised groups.

The Housing Executive will continue to promote services including day services which will assist those that are experiencing chronic homelessness including rough sleepers.

The Housing Executive will adopt innovative approaches to preventing homelessness through a dedicated programme of activity including specifically targeting chronic homelessness. A range of activities will be commissioned and/or grant funded to prevent homelessness including effectively targeted awareness campaigns, to identify households at risk of homelessness and ensure appropriate tailored advice, assistance and support is available to them as well as engagement activities instigated and promoted.

There is a need to improve public awareness and communicate prevention work to the public around chronic homelessness. The Housing Executive needs to provide a positive message to the public on how they can assist those that are experiencing chronic homelessness. This can in part be achieved through the Homelessness Strategy's Communication strategy to assist in promoting prevention and providing guidance on action that can be taken by the public and highlight difference between street activity and actual homelessness.

This action plan has identified the need for better alignment between statutory and strategic requirements in terms of prevention, with a statutory focus on prevention and rehousing. This can be achieved through legislative reviews including consideration given to the extension of homelessness legislation to mirror the Homelessness Reduction Act 2017 in England, specifically to introduce new duties to the original statutory rehousing duty; duty to prevent homelessness and duty to relieve homelessness.

This will enable a renewed focus on the prevention of homelessness and local joint working, and has the potential to provide more client-focussed, personalised statutory homelessness services and lead to better legislative and strategic alignment.

### **Objective 5- Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment**

The Housing Executive intends to implement formal mechanisms to ensure support is targeted at those identified as experiencing chronic homelessness or at risk of experiencing chronic homelessness.

The Housing Executive would wish to see a range of cross tenure tenancy sustainment support available to help prevent people from losing their tenancies and support those homeless individuals or households who have been rehoused in order to prevent recurring homelessness. Ensuring the right support, tailored to an individual's needs, which is provided alongside accommodation, is fundamental.

The Housing Executive will continue to promote prevention work by Housing Advisors and Patch Managers. The Housing Executive is committed to improving tenancy sustainment and providing customer support through the review of the Tenancy Sustainment Strategy. It will also continue to implement policies such as the Financial Inclusion Policy.

The Housing Executive will continue to support customers to access a range of housing options across all tenures. This will include identifying and seeking to address the barriers to accessing the private rented sector, potentially with the implementation of a new private rented access scheme.

The action plan includes a commitment to identify service gaps and prioritisation of service development through existing commissioning and/or grant funding arrangements to help tenancy sustainment. The Action for Year 1 will be to identify gaps in service provision in order to improve service provision and delivery.

With more resources the Housing Executive could explore other options to support the private rented sector and promote security of tenure, such as, rent/ deposit/ damage guarantee schemes and incentives to encourage landlords to provide secure long term tenancies to those who have or are experiencing homelessness.

## **Objective 6- Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible**

As part of the action plan, the Housing Executive intends to adopt the principles of a rapid rehousing approach for those who are experiencing chronic homelessness. This is about making sure that these individuals' needs are assessed and they reach a settled housing option as quickly as possible rather than staying too long in temporary accommodation.

Those who are experiencing chronic homelessness should be rapidly rehoused and offered comprehensive support to ensure their specific needs are addressed so they can move to suitable permanent accommodation at the earliest opportunity.

As a first stage of moving to rapid rehousing approach, the Housing Executive are committed to implementing arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible. This includes considering how our frontline services are delivered within the Housing Executive, the out of hours provision for homelessness and our emergency housing arrangements.

The action plan also aims to promote the prevention of rough sleeping and where rough sleeping cannot be prevented, supports a no second night out approach. We want to ensure there is a rapid response to new rough sleepers in that that we can provide an offer of accommodation that means they do not have to sleep out for a second night.

The Housing Executive wants to ensure there is rapid assessment (case management) by all agencies of those who are found to be rough sleeping or involved in street activity.

We will engage with the homeless sector to consider the role of peer support service to help those individuals who are experiencing chronic homelessness.

An important aspect of the delivery of services to the chronic homeless is through day services. It is therefore essential to consider the role of day services in delivering support. The action plan recommends the need to evaluate and review the role of day centres in delivering assistance.

## **Objective 7- Make the stay in temporary accommodation as short as possible**

As part of a rapid rehousing approach, if and when required, temporary accommodation should contribute to ending someone's experience of homelessness as quickly as possible as part of a transition back into mainstream accommodation.

The Housing Executive wants to make the stay in temporary accommodation as short as possible.

The Housing Executive supports a move to a rapid rehousing approach. Rapid rehousing means: provision of a settled mainstream housing option as quickly as possible and time spent in temporary accommodation is reduced to a minimum, with minimal transitions. When temporary accommodation is needed, the optimum type is mainstream, furnished and within the community.

The Housing Executive has commenced a strategic review of temporary accommodation in Northern Ireland which will consider how the demand for it can be reduced through effective prevention and re-housing and how the throughput and move-on from temporary accommodation can be improved.

As part of the review the Housing Executive will also seek to better understand current and future needs for temporary accommodation which considers the type, quality and location of this accommodation as well as the overall mix.

The action plan commits the Housing Executive to ensuring homelessness applicants have access to safe emergency accommodation with support by ensuring adequate provision and suitable move-on to improve throughput. The Housing Executive supports a person centred approach and wants to improve emergency accommodation provision for those that need it in appropriate locations (near family support or strong connections) that includes a mixed model of temporary accommodation.

## **Objective 8 - Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as soon as possible**

There is a need to explore a comprehensive range of housing options, with planned move on to permanent accommodation through social housing, the private rented sector or using the Housing First model. It is imperative to ensure all housing solutions provide clear support and exit plans for those who are experiencing chronic homelessness. This will ensure enhanced provision of right type of service for the chronic homelessness.

For those experiencing chronic homelessness, people with multiple needs beyond housing, there is a need to adopt Housing First models and investigate the feasibility of extending provision throughout NI. While Housing First services are being delivered in Northern Ireland and have been positively evaluated in terms of their benefits, they are on a proportionately smaller scale than other regions of the UK and are geographically restricted to Belfast and Derry/Londonderry.

The Housing Executive is committed to the provision of the right type of accommodation and support in order to effectively implement a comprehensive Housing First provision across Northern Ireland. This will require a multi-agency approach to consider and address both the accommodation and non-accommodation needs of these individuals.

Alongside the appropriate accommodation provision there is a need to identify and implement appropriate support services. This support should be flexible as time bound models of service delivery are not always best for this client group. The outcome will be improved provision of the right type of service for the chronic homelessness.

## **Objective 9 - Promote inter-agency issues and actions required to address chronic homelessness**

Objective 9 promotes inter-agency working to address chronic homelessness. Government departments need to continue working strategically together to address chronic homelessness. The Housing Executive will continue to work with government departments, statutory partners and homelessness service providers to ensure that the actions in this Plan complement the work of the Inter-Departmental Homelessness Action Plan through identifying gaps in service provision and addressing those shortfalls. These actions will improve the lives of those individuals or households who are

affected by chronic homelessness.

The Housing Executive supports a review of homelessness legislation. This review would involve exploring options to extending 28 days to 56 days as statutory requirement to deal with threatened homelessness and review the use of priority need and other relevant legislative guidance as identified by stakeholders.

The Housing Executive would support continued investment in multi-disciplinary working including through a review of the multi-disciplinary approach in Belfast with a view to implementing appropriate models in Belfast other urban centres such as Derry/Londonderry, Newry and Ballymena.

## **Objective 10- Ensure mechanisms in place to implement and oversee the implementation of the Chronic Homelessness Action Plan**

This objective can be linked in with the Homelessness Strategy governance mechanism as per objective 4. Reports are provided to various groups such as Central Homelessness Forum or HSSG as outlined in the strategy. This will lead to scrutiny of outcomes for those experiencing chronic homelessness and result in improved accountability and actions. We will also link with the Inter-Departmental Homelessness Action Working Group to ensure that the actions in this Plan complement the work of the Inter-Departmental Homelessness Action Plan.

## **Funding for this Action Plan**

This action plan supports the Homelessness Strategy in the early intervention and prevention of homelessness and inter-agency working. Subject to identified need the action plan will link to relevant commissioning and/or grant funding structures to provide more appropriate and targeted support services that are specifically relevant to the needs of those within the chronic homelessness category.

The aim to reduce chronic homelessness will be undermined without improvements to housing options and this action plan has attempted to help address both the causes of homelessness and to ensure that homeless households have access to appropriate temporary accommodation and can rapidly move to settled, affordable and suitable permanent housing.

The Housing Executive has looked at funding for homelessness services across the UK and although funding stream are different, comparisons in some areas of service provision can be made, for example, in relation to Housing First. In England the Housing

First programme<sup>14</sup> will receive £28 million additional Government funding for 3 different locations covering a population of just over 5 million people.

- Liverpool City Region (£7.7m) (490,000 population).
- Greater Manchester (£8.0m) (2.8.million population).
- West Midlands (£9.6m) (1.8 million population).

The Barnett formula is used to calculate funding allocated to Northern Ireland. If the formula was applied to this new £28 million allocation and previous project allocations in England, funding for Northern Ireland should increase accordingly. The impact of Housing First has been noted in a House of Commons Briefing Paper<sup>15</sup> which noted 'Having sustained accommodation helps people access cheaper mainstream services, such as primary health care.'

Existing Housing First services are already funded by public grants in England. Between 2011 and 2014, the Department for Communities and Local Government (now the Ministry of Housing, Communities and Local Government) provided £20 million to create the Homelessness Transition Fund. The fund was aimed at innovative approaches to ending rough sleeping including Housing First projects.

In addition to this the government has allocated a resource of £617 million in Flexible Homelessness Support Grant funding, which the government provides to tackle homelessness and rough sleeping.

The Scottish government<sup>16</sup> has allocated of £21 million funding to support a transition to rapid rehousing and Housing First as well as increased focus on support for people and on homelessness prevention. The Housing First Scotland Fund has been allocated funding of £3.2m<sup>17</sup> for projects across 5 cities Glasgow, Edinburgh, Stirling, Aberdeen and Dundee during 2018.

By February 2018, the Welsh Government had been funding 10 Housing First projects at a cost of £2.6 million.

The Welsh Government<sup>18</sup> is committed to investing £30 million over a two year period to tackling homelessness and rough sleeping. This includes an additional investment of £900,000 for Housing First projects covering 5 locations.

<sup>14</sup> The House of Commons Briefing Paper Rough Sleeping, 08368. (England), 23 February 2018 , Alexander Bellis & Wendy Wilson, House of Commons Library (2018) <http://researchbriefings.files.parliament.uk/documents/SN02007/SN02007.pdf>

<sup>15</sup> The House of Commons Briefing Paper Housing First: tackling homelessness for those with complex need, 08368 (England), 17th July 2018, Alexander Bellis & Wendy Wilson, House of Commons Library (2018) <http://researchbriefings.files.parliament.uk/documents/CBP-8368/CBP-8368.pdf>

<sup>16</sup> Ending homelessness 27 Jun 2018, Scottish Government (2018) <https://www.gov.scot/news/ending-homelessness/>

<sup>17</sup> Housing First Scotland projects to benefit from £3.2m fund, 7th August , 2018 Turning Point Scotland

<http://www.turningpointscotland.com/news/housing-first-scotland-projects-to-benefit-from-3-2m-fund/>

<sup>18</sup> Funding for projects supporting people out of homelessness, December 2018, Welsh Government (2018)

<https://gov.wales/newsroom/housing-and-regeneration/2018/funding-for-projects-supporting-people-out-of-homelessness/?lang=en>

**OBJECTIVE 1****Define specific criteria for measuring chronic homelessness and implement data collection arrangements****What we will do now**

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Identify chronic homelessness numbers collectable by the Housing Executive using new approved standard indicators.</b>	<p>Improve data collection by looking at enhancing information captured in the Housing Executive's existing IT systems including the Housing Management System (HMS) and/or Customer Management System (CMS). If a client meets 3 or more of the indicators they would be identified as experiencing chronic homelessness</p> <p>This should include the ability to identify those individuals within marginalised groups</p>	NIHE	Year 1	Understand the scale of chronic homelessness that is presented to the Housing Executive	There are minimal non recurrent costs associated with the reconfiguration of existing NIHE IT systems
<b>Review nature and format of indicators</b>	Review criteria to define chronic homelessness indicators to ensure they are appropriate after improvements in data collection	NIHE/CHF/ Local Area Groups	Year 2	Validated criteria for the measurement of chronic homelessness	There may a non-recurrent financial impact if an independent review is procured and implemented
<b>Conduct annual street counts in Belfast, Derry/ Londonderry and other towns/cities as identified by the Local Area Groups</b>	Organise annual counts between 1st October-30th November each year where required	NIHE/Local Area Groups	Year 1 Annually (Oct/Nov)	Understand the scale of rough sleeping in Northern Ireland	There is a small recurrent cost associated with the completion of these counts

**What could be done with more resources**

<b>Identify chronic homelessness numbers collectable by other agencies using new standard indicators.</b>	<p>The methodology will use data initially from the Housing Executive but this will be developed further to include data from other sources and other agencies which will trace customer journeys across agencies</p> <p>This may be achieved through use of universal identifier for each customer</p> <p>The Action for Year 1 will be restricted to exploring options for the implementation of joint data capture arrangements</p>	All stakeholders	Year 1 action  Year 2 and 3 actions dependent on Year 1	Understand the scale of chronic homelessness that is presented to all agencies that provide services to chronic homeless individuals	There are likely to be non-recurrent costs associated with setting up shared information capture arrangements
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*Continued overleaf*

## OBJECTIVE 1 continued

### What could be done with more resources

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Conduct street audits</b>	Complete Belfast and L'Derry street audit.  Explore potential of Newry street audit	NIHE to co-ordinate with other statutory input	1st Street Audit completed by Year 1  Subsequent audits Year 2 and Year 3	More comprehensive understanding of the scale of street activity including rough sleeping	There is an associated non recurrent funding requirement for the appointment of appropriate stakeholder(s) to complete the street audits
<b>Conduct research to understand the specific impacts of chronic homelessness on women</b>	Complete research which looks at the scale and impact of chronic homelessness on women and gender specific issues	NIHE/CHF/HSSG	Year 2	More detailed understanding of female specific chronic homelessness issues	Non recurrent cost associated with commissioning and conduct of research
<b>Conduct research in to Poly-drug and IV drug addiction in single chronic homeless accommodation</b>	Complete research in to Poly-drug and IV drug which seeks to collate an evidence base of people with drug problems in single homeless accommodation	NIHE/CHF/HSSG	Year 2	More detailed understanding of the housing related support needs of single homeless people who have a drug addictions	Non recurrent cost associated with commissioning and conduct of research



## OBJECTIVE 2

### Introduce mechanisms to monitor and report on chronic homelessness trends.

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Develop reports to identify trends in relation to chronic homelessness from data collected by NIHE</b>	Analyse data collected from CMS and HMS to determine the prevalence or incidence of particular indicators to inform gap analysis in service provision	NIHE	Year 2 (to commence analysis of trends)	Understand the scale of chronic homelessness presented to NIHE	No associated cost
<b>Develop reports to identify trends in relation to chronic homelessness from data collected by all agencies</b>	Analyse data collected across all agencies providing services to chronic homeless individuals/ households. Systems must be able to track customers across services so that data is not duplicated when being reported. Explore options for the implementation of joint data capture arrangements (from objective 1)	DfC/NIHE/CHF	Year 1 action to explore options for the implementation of joint data capture	Understand the scale of chronic homelessness presented to all agencies	There are likely to be non-recurrent costs associated with shared information gathering and reporting
<b>Use Service Users Forum to assist in the provision of qualitative information on chronic homelessness</b>	One meeting per year of the Service Users Forum will focus on chronic homelessness. Take cognisance of the views of service users to improve journey of a person who is experiencing chronic homelessness	NIHE	Year 1	Understand the impact of chronic homelessness on service users	No additional cost

#### What could be done with more resources

<b>Review the causes of repeat homelessness</b>	Review causes and trends in terms of repeat homelessness and develop actions to address underlying issues	NIHE/CHF	Year 1 to agree specification	Understand the causes of repeat homelessness and target service users most at risk  Reduce repeat homelessness  Higher levels of tenancy sustainment	This is likely to be a non-recurrent cost if independent research is required
<b>Explore other mechanisms for capturing service user experiences of chronic homelessness</b>	Consider broader opportunities to capture the views and experiences of service users not restricted to accommodation service users	NIHE/CHF/HSSG	Year 1 to agree specification	Understand the impact of chronic homelessness on service users	This is likely to have a non-recurrent financial requirement if independent research is required

### OBJECTIVE 3

## Utilise chronic homelessness data and trend information to identify existing and emerging needs to address chronic homelessness in the context of legislation, policy and service provision

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>The interpretation of data and trends to inform legislation</b>	Produce analysis of data for key strategic structures in order to inform legislation review where appropriate and identify gaps in legislative frameworks	DFC/NIHE	Year 2	Analysis of trends to inform legislation, review and development	No additional cost
<b>The interpretation of data and trends to inform policy review and development</b>	Produce analysis of data for key strategic structures in order to challenge policy where appropriate and identify gaps in policy frameworks	NIHE/CHF	Year 2	Analysis of trends to inform policy implementation, review and development	No additional cost
<b>The interpretation of data and trends to inform review of existing services and new service requirements</b>	Produce analysis of data to inform service review and commissioning and/or grant funding including: SP Thematic Group on Homelessness, Homeless Funding requirements and future funding criteria Inter-departmental priorities	All stakeholders	Year 2	Analysis of trends to inform service review, funding and commissioning and/or grant funding	No additional cost

#### What could be done with more resources

<b>Use data on chronic homelessness and indicators to target prevention</b>	<p>Review data collected to identify particular groups which are at the highest risk of chronic homelessness and seek to prioritise the pathways and interventions needed to prevent this outcome for particular groups</p> <p>This will involve identifying high risk groups and potentially introducing preventative measures through for example, Task and Finish group, support services and education programmes or NIHE website advice to target these groups</p>	All stakeholders	Year 2	Analysis of trends to inform service review, funding and commissioning and/or grant funding	Potential associated recurrent cost for data analysis and targeted prevention activity
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## OBJECTIVE 4

### Develop mechanisms across agencies for the early identification of those at risk of homelessness or chronic homelessness

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Promote prevention/ early intervention</b>	Develop Advice and assistance for prevention – online NIHE website	NIHE	Year 1 and ongoing	Promote prevention/ early intervention	No additional cost
<b>Promote prevention/ early intervention</b>	Support Department of Education initiatives through Inter-Departmental Homelessness Action Plan, for example, development of resources for schools in relation to homelessness and appropriate advice available and given by Colleges through welfare support, GP's etc	NIHE	Year 1 and Ongoing	Promote prevention/ early intervention	No additional cost
<b>Promote prevention/ early intervention</b>	Raise awareness of prevention through early intervention by looking at adverse childhood experiences (ACEs) and how this can be used as a chronic homelessness indicator.  Action for Year 1 focussed on working with Health & Social care to review research and understand its application to homelessness prevention	All stakeholders	Year 1 and ongoing	Promote prevention/ early intervention	No additional cost currently identified
<b>Address needs of particular groups on an inter-agency basis</b>	Review protocols which address the needs of particular groups including Young People, Prisoners, Hospital Discharge and leaving care	All stakeholders	Year 1 (Prisoners Protocol)  Other protocols reviewed Year 2 and 3 as required	Protocols developed which set out processes for sustainable housing options prior to discharge/ release  Reduction in homeless presentations following discharge	No additional cost
<b>Improve accessibility for marginalised groups including advice to PFA who are ineligible for housing assistance</b>	Work with other agencies to establish methods to identify this group.  Explore improved data collection across all agencies  Ensure staff are trained to provide advice and assistance to this group  Use Communication strategy to promote public awareness regarding support, advice and assistance	All stakeholders	Subject to discussion with sector	Sharing of information of numbers of PFA who are ineligible for housing assistance.  More effective targeted advice for marginalised groups.	No additional cost identified at this stage

Continued overleaf

## OBJECTIVE 4 continued

### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Promote services which help build skills and confidence of chronic homeless including rough sleepers</b>	Promote services which help chronic homeless build skills and confidence and help them access training and employment including day services  Implement as part of the Homeless Strategy Communication plan	NIHE/HSSG/ CHF	Year 1	Increased public awareness of chronic homelessness and how to prevent it	No additional cost identified at this stage

### What could be done with more resources

<b>Adopt innovative approaches to preventing homelessness through a dedicated programme of activity including specifically targeting chronic homelessness</b>	Range of activities commissioned and/or grant funded to prevent homelessness including awareness campaigns, engagement activities etc.	All stakeholders	Year 1 and ongoing into years 2 and 3	Innovative approaches to preventing homelessness will be encouraged and explored, which would include effectively targeted campaigns to identify households at risk of homelessness and ensure appropriate tailored advice, assistance and support is available to them.  All interventions will be rigorously evaluated so that successful approaches can be extended.	Dedicated recurrent funding will be required for this action
<b>Improve public awareness around chronic homelessness.  Communicate prevention work to the public</b>	Provide a positive message to the public on how they can assist those that are experiencing chronic homelessness.  Use Homelessness Strategy's Communication strategy to assist prevention and guidance on action that can be taken by the public and highlight difference between street activity and actual homelessness.  Encourage giving money to charities rather than to those involved in street activity  Implement as part of Homeless Strategy Communication Plan	NIHE/CHF/ HSSG	Year 1	Raise public awareness of chronic homelessness and how public can provide support to prevent and tackle homelessness	Additional recurrent cost linked to communication activity

## OBJECTIVE 4 continued

### What could be done with more resources

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Better alignment between statutory and strategic requirements in terms of prevention, with a statutory focus on prevention and rehousing</b>	<p>Consider extension of homelessness legislation to mirror the Homelessness Reduction Act 2017 in England specifically to introduce new duties to the original statutory rehousing duty: Duty to prevent homelessness and Duty to relieve homelessness.</p> <p>This will enable a renewed focus on the prevention of homelessness and local joint working, and has the potential to provide more client-focussed, personalised statutory homelessness services.</p>	All stakeholders	TBA (requires revisions to primary legislation)	<p>Better legislative and strategic alignment</p> <p>Statutory focus on prevention of homelessness</p>	N/A

## OBJECTIVE 5

### Implement a range of support services to help people sustain their accommodation including floating support and tenancy sustainment

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Formal mechanisms to ensure support is targeted at those identified as experiencing chronic homelessness within the Housing Executive and other agencies</b>	Review NIHE policies to ensure that the appropriate policies are in place to reflect the needs of the chronic homelessness based on data collected and analysed under objective 2	NIHE	Year 1 and ongoing	Improved tenancy sustainment	No additional cost
<b>Continue to promote prevention work by Housing Advisors and Patch Managers</b>	<p>-Promote prevention work and record type of prevention</p> <p>- Support tenancy sustainment through review of Customer Support and Tenancy Sustainment Strategy for those experiencing chronic homelessness.</p> <p>-Continue to implement Financial Inclusion Policy</p>	NIHE	Year 1 and ongoing	Improved NIHE outcome based accountability indicators	No additional costs
<b>Promote PRS and security of tenure</b>	<p>-Develop housing solutions and tenancy sustainment through the Private Rented Sector. Linked with objective 2 of the Homelessness Strategy to ensure delivery of a successful Private Rented Sector Access Scheme.</p> <p>-Explore new options for affordable housing. This may include shared accommodation model for permanent accommodation (Potential policy/ legislative development required)</p> <p>- Explore options and methods by which landlords can be incentivised to provide properties for individuals experiencing chronic homelessness. This will include:</p> <ul style="list-style-type: none"> <li>• Research on available options in other jurisdictions.</li> <li>• Development of new models that will assist in the delivery of this action.</li> </ul>	All stakeholders	Year 1, Year 2 and Year 3	Improved housing solutions and tenancy sustainment	Recurrent costs associated with this action

## OBJECTIVE 5 continued

### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Ensure Patch Managers work with most vulnerable tenants promoting health, wellbeing and resettlement skills</b>	-Ensure patch managers promote health and well-being and resettlement skills through promotion of a directory of services within each Area which is being undertaken as a Year 2 action in the Homelessness Strategy implementation plan	NIHE/Local Area Groups	Year 1 and ongoing	Improved health and wellbeing of homelessness applicants	No additional costs
<b>Identification of service gaps and prioritisation of service development through SP Commissioning and/or grant funding arrangements</b>	Make results of new data collection available to Supporting People so that service delivery models can be reviewed and appropriate changes made to facilitate better service delivery thus ensuring that support is the right type in the right location for vulnerable individuals who are experiencing chronic homelessness  identify gaps in service provision	NIHE Housing Services/ Supporting People	Year 1 Action to identify gaps in service provision	Improved service provision and delivery to the chronic homelessness	TBC – Determined after year 1 as a result of identification of service gaps
What can be done with more resources					
<b>Explore other options to support PRS and security of tenure</b>	If funding available explore rent/deposit/damage guarantee schemes -Encourage landlords to provide secure long term tenancies e.g. a 3 year tenancy	All stakeholders	TBC	Improved housing solutions and tenancy sustainment	There are likely to be recurrent costs associated with schemes

## OBJECTIVE 6

### Implement arrangements to ensure services engage with people at risk of chronic homelessness as quickly as possible

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Improve prevention work through inter-agency working</b>	Support the implementation of the recommendations from Health and Homelessness Task & Finish Group on Improving Access to Health & Social Care for People Experiencing Homelessness  Year 1 Actions will include NIHE support to the creation of a Homelessness Hub pilot in Belfast with access to services including housing and health. This will be evaluated in the context of its broader roll-out	All stakeholders	Year 1	More effective engagement with statutory services for chronic homeless individuals	There is a potential associated recurrent cost aligned to this action
<b>Consider how we develop services in Housing Executive e.g. counter services that can triage chronic homeless clients</b>	Review counter services in order to facilitate triage of chronic homeless clients	NIHE	TBC	Improved access for chronic homeless to services	No additional costs
<b>Review provision of out of hours provision for homelessness including wider partnership approach to delivery</b>	Review of accommodation available out of hours  Review partnership approach to out of hours support to access accommodation	All stakeholders	Year 1	Out of hours procedures up to date and agreed by partners	To be determined, may be a cost associated with service provision outside of NIHE
<b>Promote the prevention of rough sleeping through emergency housing arrangements. Where rough sleeping cannot be prevented, support no second night out approach</b>	Continue to support outreach services in Belfast in order to identify those who require emergency accommodation. -Implement no second night out model -Place promptly in appropriate temporary accommodation. This can be helped by the implementation of recommendations from the Common Assessment Framework project and Central Access Point project -Ensure there is Rapid Assessment (case management) by all agencies of those who found to be rough sleeping or involved in street activity. This rapid assessment model could be facilitated through Homelessness Access Hub	All stakeholders	Year 1 actions	Improved engagement and reduced possibility of those individuals ending up rough sleeping	No additional cost if linked to development requirements

## OBJECTIVE 6 continued

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>What can be done with more resources</b>					
<b>Encourage the development of peer support to help chronic homeless</b>	Create new peer service to support those facing chronic homelessness. Research required and project team to be established. Link in with the proposed Peer Advocacy Service which will provide an enhanced community & voluntary support services including peer led service to support access to healthcare for those experiencing chronic homelessness	All stakeholders	Year 3	Improved engagement and support for chronic homeless	Potential recurrent cost of peer support
<b>Consider role of day services in delivering help to chronic homeless</b>	Evaluate and review role of day centres in delivering assistance to those experiencing chronic homelessness. This will include a report on effective practice.	NIHE/external consultant	Year 2	Improve number of chronic homeless receiving relevant support from day centres	Associated non recurrent cost with review
<b>Promote the prevention of rough sleeping through emergency housing arrangements. Where rough sleeping cannot be prevented, support no second night out approach</b>	Continue to support and extend outreach services in L'Derry and explore possibility of outreach services in other areas in order to identify those who require emergency accommodation. -Implement no second night out model	All stakeholders	Year 1 action to identify need	Improved engagement and reduced possibility of those individuals ending up rough sleeping	Cost to be determined after year 1

## OBJECTIVE 7

### Make the stay in temporary accommodation as short as possible

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Review current provision to identify service gaps and service effectiveness</b>	Independent review of temporary accommodation provision being carried out	NIHE/external consultant	Year 2	Better strategic alignment and effective service provision	Non recurrent cost associated with review
<b>Ensure access to safe emergency accommodation with support is available by ensuring adequate provision and improving move-on to improve throughput</b>	<p>Support a person centred approach – Improve emergency accommodation provision for those that need it in appropriate locations (near family support or strong connections) that includes a mixed model of temporary accommodation with the provision of wet hostels, hostels with low support needs and single lets. There is a need to review tolerance levels within temporary accommodation</p> <p>This can be achieved through review of Single Let Provision and Strategic Review of Temporary Accommodation -</p> <p>-Implement recommendations Common Assessment Framework project and Central Access Point project to ensure temporary accommodation is being fully utilised in the most appropriate manner</p>	<p>Review of temporary accommodation – external consultant NIHE internal project</p> <p>All stakeholders</p>	<p>TBC</p> <p>Review of single let provision – Year 1 action</p> <p>Strategic Review of Temp accomm Year1- 2 action</p> <p>CAF and CAP Year 1 actions</p> <p>Year 1</p>	<p>Appropriate emergency accommodation provision for those that need it</p>	<p>Non recurrent cost associated with review</p> <p>Recurrent cost of additional service requirements</p>



## OBJECTIVE 7 continued

<p><b>Move to a rapid rehousing approach</b></p> <p><b>Rapid rehousing means:</b></p> <p><b>A settled mainstream housing option as quickly as possible. Time spent in temporary accommodation reduced to a minimum, with minimal transitions. When temporary accommodation is needed, the optimum type is mainstream, furnished and within the community</b></p>	<p>Ensure there is rapid assessment (case management) by all agencies of those who found to be rough sleeping or involved in street activity. This rapid assessment model could be facilitated through Homelessness Hub</p> <p>Person centred approach- Ensure those involved in street activity continue to be offered appropriate support services particularly where individuals are reluctant to initially engage</p>	NIHE	Year 1 and ongoing	Improvement in time taken to make suitable placements	<p>Non- recurrent cost associated with review</p> <p>Recurrent cost of additional service requirements</p>
<p><b>Work with partners to identify housing outcomes to reduce length of time in temporary accommodation</b></p>	<p>Review access and referral arrangements for temporary accommodation (via CAF/CAP project)</p> <p>Evaluate HOME model (Housing Options Made Easier) with a view to extending beyond Belfast</p>	All stakeholders	Year 2	Improvement measured by Reduction in length of time of temporary accommodation	<p>Additional cost associated with implementation of outcomes from Common Access and Assessment project. Extension of HOME model will require further Homeless funding</p>

**OBJECTIVE 8**

**Consider a range of housing options for the chronic homeless including Housing First models and ensure they are supported into permanent accommodation as quickly as possible**

**What we will do now**

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>For people with multiple needs beyond housing adopt a Housing First approach</b>	Investigate the feasibility of the provision of additional services including Housing First in Belfast and throughout NI.	Supporting People Thematic group/ Housing solutions	Year 1	Improved provision of right type of service for chronic homelessness	No additional costs

**What can be done with more resources**

<b>For people with multiple needs beyond housing adopt a Housing First approach</b>	Support a Housing First approach for chronic homeless individuals. Ensure Housing solutions provide clear support and exit plans for those who are experiencing chronic homelessness.	Supporting People Thematic group/ Housing solutions	Year 1 and ongoing	Improved provision of right type of service for chronic homelessness	Additional recurrent cost associated with action
<b>Identify and implement transition arrangements to change approach and current service provisions</b>	Ensure provision of support is flexible and interchangeable as time bound models of service delivery are not always best for this client group.	SP thematic group	Year 1 and ongoing	Improved provision of right type of service for chronic homelessness	Additional recurrent cost associated with action

## OBJECTIVE 9

### Promote inter-agency issues and actions required to address chronic homelessness

#### What we will do now

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
<b>Government departments to continue working together to deal with chronic homelessness including DFC, health and justice. NIHE and Health Trusts to work collaboratively to support those that are experiencing chronic homelessness</b>	<p>Better cross over in policies and funding across government to allow services to work collectively to provide the best support for individuals by promoting multi- agency partnerships to be addressed through Inter-Departmental Homelessness Action Plan</p> <p>Identify good practice and ensure staff across agencies have sufficient knowledge and training to ensure appropriate and timely signposting for individuals so they have access to the help they require</p>	All stakeholders	Year 1 and ongoing	Improved inter-agency working resulting in improved service for chronic homeless	No additional costs
<b>Review homelessness legislation</b>	<p>Review homelessness legislation.</p> <p>Review extending 28 days to 56 days as statutory requirement to deal with threatened homelessness</p> <p>Review use of priority need and other relevant legislative guidance as identified by stakeholders</p>	All stakeholders	TBC	Improved prevention service provision for chronic homeless	TBC

#### What can be done with more resources

<b>Support Investment in a multi-disciplinary working system</b>	<p>Review multi-disciplinary team approach in Belfast</p> <p>Implement a multi -disciplinary team approach outside Belfast in other urban centres L'Derry, Newry and Ballymena</p>	All stakeholders	Year 1 and on going	Improve health and wellbeing of chronic homeless	Additional cost associated with action
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**OBJECTIVE 10****Ensure mechanisms in place to implement and oversee the implementation of the Chronic Homelessness Action Plan****What we will do now**

What will we do?	How will we do this?	Responsibility	When will we do it?/ Comments	Outcome	Funding requirements
Link in with Homelessness Strategy governance mechanism as per objective 4	Report to various groups such as Central Homelessness Forum or HSSG as outlined in the strategy	All stakeholders represented on the various groups	Year 1 and ongoing	Improved accountability and actions	No additional costs
Link to Inter-Departmental Homelessness Action Plan for non-accommodation based issues	Link with Inter-departmental Homelessness Action Working Group	All stakeholders	Year 1	Improved service to chronic homeless	No additional costs



This document is available in alternative formats.  
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MAY 2019

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RS-246-02-19



<b>Subject:</b>	Waterworks Pitches (Westland)
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Ryan Black, Director of Neighbourhood Services
<b>Contact Officer:</b>	Ryan Black, Director of Neighbourhood Services

## Restricted Reports

Is this report restricted? Yes ☐ No ☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

☐  
☐  
☐  
☐

## Call-in

Is the decision eligible for Call-in? Yes ☒ No ☐

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	Members are reminded that a new changing pavilion was built at the Westland pitch adjacent to the Waterworks in North Belfast as part of the Pitches Strategy investment. This development made the site more attractive to teams playing in the Northern Amateur Football League (NAFL).
1.2	The annual process of pitch allocations facilitated by League Secretaries subsequently saw a significant increase in interest for use of the site from clubs in the area. The issue of pitch allocation was not resolved for the Westland site and was raised with Council by the League Secretaries.

1.3	The purpose of this report is to update members of the progress to date in regards to pitch allocation at Westland and to agree the arrangements to bring this pitch into use for the 2019 and subsequent football seasons.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>(i) Agree to enter into a ground share agreement with both Westland Young Men's &amp; St Patrick's Football Club for the Waterwork pitches (Westland).</li> <li>(ii) Agree that this arrangement will be in place for up to 5 years and will be reviewed annually as part of the pitch allocation process.</li> </ul>
<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	Members are advised that over the past number of years officers have been working with football clubs, who had initially expressed an interest to League Secretaries and then confirmed this through a formal expression of interest process, for the use of the Westland pitch for Saturday fixtures, with a view to reaching a suitable agreement that would bring the pitch into use
3.2	Of the 6 teams from 4 clubs who had originally expressed an interest in utilising the pitch over the course of the discussion, 3 teams (2 clubs) have formally withdrawn their interest leaving only Westland Young Men's (1 <sup>st</sup> & 2 <sup>nd</sup> teams) and St Patrick's Football Club (2 <sup>nd</sup> team) with a formal interest.
3.3	Since that time officers have also been advised that the Westland Young Men's Club have further redeveloped to now only include 1 team and a new Westland Football Club has now formed.
3.4	By way of context, Members are also asked to note that Council does not directly provide 'home grounds' for sports clubs, however, there are two ways in which clubs have been able to meet the requirements of the Northern Amateur League to enter into the higher leagues.
3.5	Firstly, in the past, the Council entered into Facilities Management Agreements and more recently through Partner Agreements with sports clubs and organisations. These agreements were secured through publicly advertised expressions of interest. Successful applicants have used this process to provide preferential use of pitches for clubs and have, through the erection of signage, displayed the impression that these facilities are the home



	<p>of specific clubs. This ability to manage the allocation process has led to a number of clubs being able to demonstrate control of the site in order to satisfy the requirements of the IFA for entry into the higher levels of the Northern Amateur League.</p>
3.6	<p>Secondly, the way in which clubs have secured use of facilities is by bringing investment to the asset, such as the Ulster Council of the GAA, Clarendon Development Association, Suffolk FC etc. Depending on the source of the funding, it is usual for terms and conditions to be attached to the funding / investment. Normally one of the requirements will be to have security of tenure, i.e. the funding body will seek to ensure that the funding will be used for the purpose for which it was intended and will seek to ensure that the applicant (recipient of the funding) will secure the benefit of the funding. Therefore sports clubs have sought to secure funding from a variety of sources and have used this to upgrade Council facilities and in return they have sought security of tenure which effectively enables them to secure use of the pitch for their own use and meet the requirements of the IFA for entry to higher levels of the Northern Amateur League.</p>
3.7	<p>In an attempt to bring the Waterworks (Westland) discussion to a resolution, officers have hosted a collective meeting with all 3 teams in an attempt to reach an agreement around a potential ground share arrangement.</p>
3.8	<p>At this meeting a suggestion for a 3 way ground share arrangement was discussed and it was agreed that the viability of this would be further explored with league secretaries, who are responsible for the development of the fixtures which includes pitch allocation.</p>
3.9	<p>A meeting with a representative from the league secretaries and the N.I Amateur League was facilitated on 13<sup>th</sup> May 2019 and it was confirmed that a 3 way ground share arrangement was not a workable solution in terms of the requirement for 'home &amp; away' matches on alternative weeks, however they did confirm that a 2 way ground share arrangement was a workable solution, which already existed across other Council pitches.</p>
3.10	<p>As discussed and agreed at the North Area Working Group in February 2019, if no agreement could be reached then a recommendation should come forward that would enable the pitch to be brought into use for the 2019 football season.</p>
3.11	<p>In an attempt to bring this matter to a conclusion officers have referred back to the original expression of interest process and the 2 remaining clubs that had formally expressed an interest at that stage (i.e. Westland Young Men's &amp; St Patrick's Football Club). Given that the Westland Football Club is essentially a new club, their interest has not been formally</p>

	<p>registered as part of the initial expression of interest process and therefore was not being further considered as part of this process.</p>
3.12	<p>As a result of the above it is recommended that the Council proceed to enter into a ground share arrangement for the Westland Young Men's and St Patrick's Football Club to utilise the Waterworks (Westland) pitch beginning with the 2019 football season for a period of up to 5 years, to be reviewed annually as part of the pitch allocation process.</p>
	<p><u>Financial &amp; Resource Implications</u></p>
3.13	<p>None.</p>
	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.14	<p>A formal expression of interest process was carried out which was open to all football clubs in the area. Over time a number of clubs/teams have withdrawn leaving Westland YM and St Patrick's FC as the only clubs remaining from the original list.</p>
<b>4.0</b>	<p><b>Appendices – Documents Attached</b></p>
	<p>None.</p>



<b>Subject:</b>	Facilities Management Agreement Suffolk Football Club
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Ryan Black, Director of Neighbourhood Services Alison Allen, Neighbourhood Services Manager (West)

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

☒

No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	To advise elected Members of the approaching termination date of the Facilities Management Agreement with Suffolk Football Club and to seek approval as to the future relationship with this club.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to recommend that;</p> <ul style="list-style-type: none"> <li>The Facilities Management Agreement dated 9<sup>th</sup> August 2012 be terminated in line with its maximum term of 7 years. It is further recommended that Suffolk Football Club are offered preferential use of facilities at this location for a period of 10 years in recognition of their initial capital investment in development of the pitch and the ongoing management and maintenance of the site entirely at the expense of the club.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	Up until May 2017, Suffolk Football Club had 2 Facilities Management Agreements (FMA) in place on a number of pitches at the playing fields at Carnamore Park. The FMA from 2008 terminated in May 2017 and control of the 3 pitches it related to reverted to Belfast City Council.
3.2	A second agreement, in place since August 2012, related to a single pitch at the same site. This pitch had been disused for many years. Suffolk Football Club applied for Alpha funding to carry out the necessary drainage works to bring the pitch back into use. The work was carried out at no cost to Belfast City Council and the reinstated pitch was given into the control of Suffolk Football Club under the 7 year FMA dated August 2012. No financial support accompanied the FMA and the club maintained the pitch entirely at their own expense.
3.3	In 2014, as part of the capital programme, the Council improved the facilities associated with the Suffolk Football Club pitch, installing new changing and meeting facilities in the form of modular buildings. These facilities have to date also been managed and maintained by the club at their expense. The club have been playing at IFA intermediate league standard at this site.
3.4	Members will recall that Facilities Management Agreements across sports sites are to be phased out. A report submitted to the People and Communities Committee in August 2016, authorised officers to engage with Suffolk Football Club and other clubs in similar circumstances to regularise arrangements for the management of sites after FMAs terminate.
3.5	Council officers engaged with Suffolk Football Club over several months and are recommending that the club be offered preferential use of this single pitch at Suffolk Playing fields, in recognition of their considerable financial investment over the last 7 years in the management and maintenance of this pitch and its facilities. The offer of preferential use would align the club's position to that agreed by the People and Communities Committee in May 2017 for the facility at Clarendon Playing fields.

3.6	<p>The financial investment of the club into this site in the last 7 years, over and above the initial £30,700 grant for pitch improvement works, has amounted to £105,000 made up of annual maintenance and management expenditure of £15,000 on the buildings and pitch.</p> <p><u>Financial &amp; Resource Implications</u></p>
3.7	<p>All income achieved from bookings for this pitch will now revert to the Belfast City Council and will be used to offset the annual maintenance costs, which had previously been the responsibility of Suffolk Football Club.</p>
3.8	<p>The £10,000 transition payment made available to some other FMA holders on termination of their agreement will not apply in this case as the FMA with Suffolk Football Club was not supported by any financial contribution by the Council and the club will not be at a financial detriment by the new arrangement.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.9	<p>There are no equality, good relations or rural needs implications associated with this report.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	<p>None.</p>

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<b>Subject:</b>	Request for review of Greater Village Regeneration Trust (GVRT) Blythefield Lease
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Ryan Black, Director of Neighbourhood Services
<b>Contact Officer:</b>	Stephen Leonard, Neighbourhood Services Manager

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

☐  
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## Call-in

Is the decision eligible for Call-in?

Yes

☒

No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	To bring to the attention of Members a request from Greater Village Regeneration Trust (GVRT) in relation to the terms of their lease for Blythefield 3G pitch and pavilion and to request authorisation to review the terms of the lease.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to;</p> <ul style="list-style-type: none"> <li>Recommend that SP+R authorise officers from Estates and City and Neighbourhood Services to engage with GVRT to review the terms of the current lease.</li> <li>Should relevant officers find cause to support any or all of the requested changes in respect to the issues raised by GVRT as at 3.7 below that these are directly passed to SP+R for consideration.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	Greater Village Regeneration Trust (GVRT) is an urban regeneration charity based in the Village area of South Belfast. It delivers a range of inter-related programmes that seek to improve the quality of life for local residents. Its primary remit is to address housing unfitness, while dealing with educational under-achievement, worklessness, lack of community space, health and well-being concerns and improving community cohesion.
3.2	At its meeting on 19 <sup>th</sup> August 2016 SP+R, at the recommendation of the People & Communities Committee, approved the granting of a 10 year lease to Greater village Regeneration Trust for Blythefield Open Space. This site is located in an area bordered by Sandy Row and Donegall Road. In 2009 a polymeric MUGA and changing pavilion was provided as part of a regeneration project funded by BRO but on completion and under council management the facility was significantly underused.
3.3	In 2016 GVRT made a successful application to Sport NI for £100,000 funding to convert the polymeric surface to artificial grass (3G) to increase the appeal of the facility to the local community and maximise on its potential to address the promotion of health and wellbeing in the area.
3.4	In order to meet the requirements of Sport NI, GVRT required security of tenure to enable the facility to function for a period of 10 years and to satisfy this requirement it was agreed a lease would be provided from the date of completion transferring control of the pitch and small changing room pavillion to GVRT. Works were carried out by a contractor appointed by GVRT and council officers had no part in the project management of the works.
3.5	A practical completion certificate was issued by the contractor on 23 <sup>rd</sup> February 2018 and the lease is dated 22 <sup>nd</sup> May 2018. There were, however, a significant number of defects to the pitch which rendered it unplayable until early 2019. A defects correction certificate was finally issued on May 30 <sup>th</sup> 2019.
3.6	GVRT pay an annual rent of £1,400 for the pitch and the 2 room pavilion and the current lease requires the leasee to be responsible for taking out buildings and contents insurance, the current premium being £9,754. The leasee is also responsible for all maintenance.



3.7	<p>The trust have approached officers of CNS to request that the lease is reviewed to align the terms to match those of other community focused assets within the department.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• The responsibility for premises insurance reverts to the council in order that the current premium can be reduced to divert funds back into programming activity;</li> <li>• The council take on the responsibility for maintenance of the small changing pavilion as the trust believe this is outside their expertise; and</li> <li>• That the boundary of the lands held under the lease is reviewed.</li> </ul>
3.8	<p>The trust propose they remain responsible for maintenance of the pitch and with appropriate training will carry out the standard occupier's Health and Safety duties associated with the pavilion building and which largely consist of regular legionella flushing and fire checks</p> <p><u>Financial &amp; Resource Implications</u></p>
3.9	<p>There will be an increase in insurance costs of £500pa associated with the council taking on responsibility for the premises insurance for the pavilion building.</p>
3.10	<p>There will be a requirement for the Property Maintenance unit and their contractor's team to undertake compliance and inspection duties for this building and potentially to carry out maintenance. Should both of these responsibilities transfer back to the council on review of the lease there will be a small impact on budgets. This impact would be quantified for inclusion in a report to SP+R.</p>
3.11	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>None.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	None.

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<b>Subject:</b>	Review of Management Arrangements for the pitch at Sally Gardens
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Ryan Black, Director Neighbourhood Services Alison Allen, Neighbourhood Services Manager, West Belfast.

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

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☐

## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	The purpose of this report is to update Committee on the Management Arrangements at Sally Gardens.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>i. agree to extend the current management agreement in respect of the 3G pitch and changing pavilion to 31<sup>st</sup> March 2020 in line with other BCC revenue contracts with the group;</li> <li>ii. agree that a review of arrangements is carried out in advance of this period ending to determine the effectiveness of the arrangements and recommend future requirements.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	The Committee is reminded that at its meeting on 9 <sup>th</sup> February 2016 it received a report which set out the arrangements agreed under Local Government Reform in respect of land and facilities at Sally Gardens, which had previously come under the Lisburn City Council boundary.
3.2	In subsequent meetings the Committee approved a pilot management arrangement in respect of the newly constructed 3G artificial turf pitch. It was agreed at meetings in April 2016, September 2016 and in February 2017 to pilot a management process. This was initially piloted and reviewed and subsequently extended to allow adequate time to consider the arrangement.
3.3	The Committee is reminded that a changing pavilion was completed in August 2017. Jointly funded by the Council and the Department for Communities, this enables matches to be played on the facility thus making it more attractive to users, existing and potential. The opening and closing of the new changing pavilion is undertaken by the Association who also clean the facility. Maintenance is a Council responsibility.
3.4	While satisfied with the arrangement, the Association stated that the short term nature of the agreement creates an element of uncertainty and as such it is unable to fully plan ahead. In response to this, Committee reviewed the existing agreement in August 2017 and agreed to extend the period to 3 years, with a review carried out by officers and a report provided to Members in advance of this period ending.
3.5	Feedback from the Park Manager and the Council's Booking Office have confirmed that the arrangement with the Association continues to work well and that they have fulfilled the duties required of them. It has also been noted that the Association deals with issues around unauthorised use and reports any damage to the facility, normally the fencing. To address this particular issue the Association has put in place an intervention programme with local young people and while still in its early stages appears to be working.
3.6	Committee should note that the Association also manage the Community Centre and is able to provide a joined up offering of services to the community and integrate the pitch with wider community activities. To support the management of the centre and the delivery of the community programme, the Association receive a revenue support grant of £55,183

	which is reviewed and agreed annually within council's Community Development support programme.
3.7	In order to align the time-frame of this funding agreement with Poleglass Community Association with other BCC funding arrangements with the group, committee are asked to extend the current contract period to the end of this financial year, 31 <sup>st</sup> March 2020. This will permit sufficient time for officers to engage with the Association in order to complete a review of all the existing arrangements with the group to determine their effectiveness, consider alignment with other council arrangements of this type and inform future requirements.
3.8	The monthly management fee of £3,666 includes match bookings. Bookings and income are processed through the Council's Pitch Booking line. An agreed method is in place to deal with last minute bookings on site.
	<u>Financial &amp; Resource Implications</u>
3.9	The monthly management fee has been incorporated within the area budget and includes management of the new pavilion.
	<u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.10	There are no known Equality or Good Relations/Rural Needs Assessment issues associated with this report.
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	None.

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<b>Subject:</b>	Financial Reporting – Quarter 4 2018/19
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Jacqueline Wilson, Business Manager, City & Neighbourhood Services Department

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	This report presents the quarter 4 financial position for the People and Communities Committee. A reporting pack containing an executive summary, financial indicators and explanation of each of the relevant indicators has been included as Appendix 1.
<b>2.0</b>	<b>Recommendations</b>
2.1	The Committee is asked to; <ul style="list-style-type: none"> <li>Note the report and the associated financial reporting pack.</li> </ul>
<b>3.0</b>	<b>Main report</b>
3.1	<u><b>Key Issues</b></u> <b>Overall Council Financial Position</b>

	<p>In financial terms, it was a difficult year for the Council. The Primark fire and changes to the rules on holiday pay led to an additional funding requirement of £3.7m. In order to protect general reserves as much as possible Members agreed not to re-allocate any in-year under spends and to use any year end balances to support the £3.7m funding requirement. The year-end position was that £2.2m of balances were available, arising from overall departmental underspend of £1.1m, capital financing underspend of £1m and specified reserve reallocation of £0.15m less rates clawback of £0.05m. This meant that £1.5m of general reserves had to be used to finance the remaining balance. Given this position, the Strategic Policy and Resources Committee agreed, at its meeting on 21 June 2019, that no further reallocations or cash flow payments would be considered until the Quarter 1 2019/20 position is presented to the Committee in August 2019.</p>
3.2	<p><b>Committee Financial Position</b></p> <p>The Quarter 4 position for the Committee is an over spend of £256,000 (0.3%) which is well within the acceptable variance limit of 3%.</p> <p>The main reasons for the Committee over-spend relates to increased staffing, agency contract costs across a number of services and the timing of grants and programmes.</p> <p><u>Financial &amp; Resource Implications</u></p>
3.3	<p>The report sets out the 2018/19 quarter 4 position.</p> <p><u>Equality or Good Relations Implications /Rural Needs Assessments</u></p>
3.4	<p>There are no equality, good relations or rural needs implications with this report.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1- Quarter 4 Performance Report















People and Communities Committee

Quarterly Finance Report

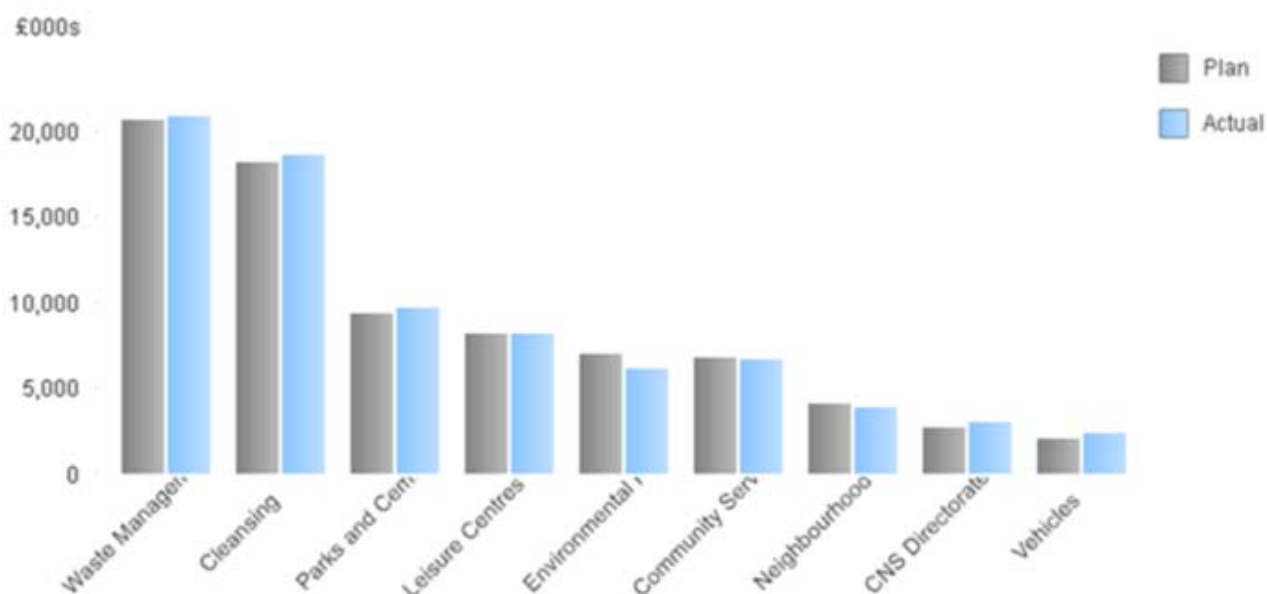
Report Period: Quarter 4, 2018/19

## Dashboard

Quarter 4, 2018-2019

Revenue Section				Page
Committee	Year End	Year End Var £000s	Var %	3-4
Waste Management		253	1.2%	
Cleansing		473	2.6%	
Parks and Cemetery Services		318	3.4%	
Leisure Centres		(14)	(0.2)%	
Environmental Health CN		(940)	(13.4)%	
Community Services		(147)	(2.2)%	
Neighbourhood and Development		(213)	(5.2)%	
CNS Directorate Support		252	9.3%	
Vehicles		274	13.1%	
<b>Total</b>		<b>256</b>	<b>0.3%</b>	

## Committee Net Revenue Expenditure: Year End Position



The Quarter 4 position for People and Communities Committee is an over spend of £256k or 0.3% of the budget. The main reasons for this are:

**Waste Management** net expenditure at Quarter 4 is £253k (1.2%) above budget and is primarily in relation to uncontrollable increased contract costs.

**Cleansing Services** net expenditure at Quarter 4 is £473k (2.6%) above budget and is due to increased compensation claims, premises and staff costs.

**Neighbourhood and Development Services** net expenditure at Quarter 4 is -£213k (5.2%) below budget due to vacant posts, grants underspent and additional income.

**CNS Directorate Support** net expenditure at Quarter 4 is £252k (9.3%) over budget and is in relation to staffing, recruitment costs and decreased income that was unplanned at the time of estimate.

**Parks and Cemetery Services** net expenditure at Quarter 4 is £318k (3.4%) over budget. There is an over spend in employee costs, due to agency cover and sickness cover and posts under review. Supplies and Services expenditure is over budget due to additional FMA costs, and minor maintenance.

**Leisure Services** net expenditure at Quarter 4 is -£14k (0.2%) under budget due to premises insurance premiums and utilities at Templemore being lower than estimate.

**Environmental Health (Excluding OSCP)** net expenditure at Quarter 4 is -£940k (13.4%) below budget and is due in the main to vacant posts/reduced hours and additional unplanned income.

**Community Services** net expenditure at Quarter 4 is -£147k (2.2%) below budget. The primary reason for this under spend is supplies and services

**Vehicles** net expenditure at Quarter 4 is £274k (13.1%) over budget due to the hire of external vehicles and vehicle repairs

## People and Communities Committee

### Section Expenditure Budgetary Analysis

	Annual Plan £000s	Actuals YTD £000s	Variance YTD £000s	% Variance
Waste Management	20,576	20,829	253	1.2%
Cleansing	18,120	18,593	473	2.6%
Parks and Cemetery Services	9,340	9,658	318	3.4%
Leisure Centres	8,128	8,114	(14)	(0.2)%
Environmental Health CN	7,017	6,077	(940)	(13.4)%
Community Services	6,788	6,641	(147)	(2.2)%
Neighbourhood and Development	4,064	3,851	(213)	(5.2)%
Vehicles	2,090	2,363	274	13.1%
City and Nhoods Business Support	2,726	2,978	252	9.3%
<b>Total</b>	<b>78,848</b>	<b>79,104</b>	<b>256</b>	<b>0.3%</b>



<b>Subject:</b>	Proposal for naming new streets and the continuation of an existing street
<b>Date:</b>	6 August, 2019
<b>Reporting Officer:</b>	Ian Harper, Building Control Manager
<b>Contact Officer:</b>	Roisin Adams, Business Coordinator

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	To consider applications for the naming of new streets and a continuation of an existing street in the City.
<b>2.0</b>	<b>Recommendations</b>
2.1	Based on the information presented, the Committee is required to make a recommendation in respect of applications for naming new streets in the City. The Committee may either: <ul style="list-style-type: none"> <li>Grant the applications, or</li> <li>Refuse the applications and request that the applicants submit other names for consideration.</li> </ul>
<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	The power for the Council to name streets is contained in Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.

3.2

Members are asked to consider the following applications for naming a new street and the continuation of an existing street in the City. The application particulars are in order and the Royal Mail has no objections to the proposed names. The proposed new names are not contained in the Council’s Streets Register and do not duplicate existing approved street names in the City.

Proposed Name	Location	Applicant
Carolan Park	Off Carolan Road, BT7	Deramore Developments Ltd
Rosepark Gardens	Off Upper Newtownards Road, BT4	Coogan & Co Architects Ltd
Diamond Gate	Off Diamond Gardens, BT10	Dimensions Architects

Proposed Continuation of Existing Street	Location	Applicant
Ormonde Gardens	Off Castlereagh Road, BT5	Rosemount Homes

3.3

Deramore Developments, Ltd have proposed Carolan Park as their first choice and Carolan Manor as the second choice, as the new street is accessed directly off Carolan Road. Rosetta Mews has been proposed by the developer as the third choice as the new street is adjacent to Rosetta Avenue.

3.4

Coogan Architects have proposed Rosepark Gardens, Rosepark Green and Rosepark Lane as the first, second and third choice for a new street which is being developed on the site of Rosepark House which has been demolished. Rosepark is also being proposed as the name is in keeping with the surrounding streets in the area.

3.5

Dimensions Architects have proposed Diamond Gate as the first choice for a new street that is being developed on the former site of 35 – 37 Diamond Gardens, which is an established street in the Finaghy area. Diamond Manor and Diamond Court have been proposed as a second and third choice.

3.6

Rosemount Homes have proposed Ormonde Gardens for the continuation of an existing street that has been extended by the developer with the construction of nine additional houses.

3.7

Financial & Resource Implications

There are no Financial, Human Resources, Assets and other implications in this report.

3.8	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> There are no direct Equality implications.
4.0	<b>Appendices – Documents Attached</b>
	None

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<b>Subject:</b>	Proposal for dual language street signs
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Ian Harper, Building Control Manager
<b>Contact Officer:</b>	Roisin Adams, Business Coordinator

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	To consider applications for the erection of dual language street signs for existing streets within the City.
<b>2.0</b>	<b>Recommendations</b>
2.1	As at least two thirds of the total numbers of persons surveyed in the streets are in favour of the proposal to erect a second street nameplate in Irish at Dunmisk Park and Dunmisk Terrace the Committee is recommended to approve the applications.
<b>3.0</b>	<b>Main report</b>
3.1	<p><u>Key Issues</u></p> <p>The power for the Council to consider applications to erect a second street nameplate in a language other than English is contained in Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.</p>

3.2	Members are asked to consider the following applications to erect a second street nameplate showing the name of the street expressed in a language other than English. The second language is Irish.																		
3.3	<table border="1"> <thead> <tr> <th>English Name</th><th>Non- English Name</th><th>Location</th><th>Applicant</th><th>Persons surveyed</th></tr> </thead> <tbody> <tr> <td>Dunmisk Park</td><td>Páirc Dhún Meascáin</td><td>Off Andersonstown Road, BT11</td><td>Councillor Séanna Walsh</td><td>48</td></tr> <tr> <td>Dunmisk Terrace</td><td>Ardán Dhún Meascáin</td><td>Off Dunmisk Park, BT11</td><td>Councillor Séanna Walsh</td><td>6</td></tr> </tbody> </table>				English Name	Non- English Name	Location	Applicant	Persons surveyed	Dunmisk Park	Páirc Dhún Meascáin	Off Andersonstown Road, BT11	Councillor Séanna Walsh	48	Dunmisk Terrace	Ardán Dhún Meascáin	Off Dunmisk Park, BT11	Councillor Séanna Walsh	6
English Name	Non- English Name	Location	Applicant	Persons surveyed															
Dunmisk Park	Páirc Dhún Meascáin	Off Andersonstown Road, BT11	Councillor Séanna Walsh	48															
Dunmisk Terrace	Ardán Dhún Meascáin	Off Dunmisk Park, BT11	Councillor Séanna Walsh	6															
3.4	The translations were authenticated by Queens University, the approved translator for Belfast City Council.																		
3.5	In accordance with the Council's policy for the erection of dual language street signs surveys of all persons appearing on the Electoral Register for the above streets were carried out and the following responses were received.																		
3.6	<p><b>Dunmisk Park, BT11</b></p> <p>35 people (73%) are in favour of the erection of a second street nameplate 13 people (27%) did not respond to the survey</p>																		
3.7	<p><b>Dunmisk Terrace , BT11</b></p> <p>5 people (83%) are in favour of the erection of a second street nameplate 1 person (17%) did not respond to the survey</p>																		
3.8	The Council's policy on the erection of a second street nameplate requires that at least two thirds (66.6%) of the people surveyed must be in favour of the proposal to erect a second street sign in a language other than English.																		
3.9	<p><u>Financial &amp; Resource Implications</u></p> <p>There is a cost of approximately £500 to cover the cost of the manufacturing and erection of the dual language street signs. The cost for these street signs has been allowed for in the current budget.</p>																		
3.10	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>There are no direct equality/rural needs implications.</p>																		
4.0	<b>Appendices – Documents Attached</b>																		
	None																		

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<b>Subject:</b>	Request for the hire of Botanic Gardens for a series of music events
<b>Date:</b>	6th August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City and Neighbourhood Services
<b>Contact Officer:</b>	Stephen Leonard , Neighbourhood Services Manager, South Belfast

## Restricted Reports

Is this report restricted?

Yes

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No

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If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	Members are reminded that on 4 <sup>th</sup> June 2019 a formal request was received by Aiken Promotions to host a series of music events during the month of June in the years 2020, 2021 and 2022 in Botanic Gardens
1.2	Members agreed to defer a decision and await a report concerning the music events in Botanic Gardens in June 2019.

<b>2.0</b>	<b>Recommendation</b>
2.1	<p>The Committee is asked to:</p> <ol style="list-style-type: none"> <li>1. Grant authority to Aiken Promotion request: <ul style="list-style-type: none"> <li>• for use of the great lawn at Botanic Gardens for a series of music events with attendances under 5,000 persons in the years 2020, 2021 and 2022; and</li> <li>• to include set up and take down.</li> </ul> </li> <li>2. Grant authority to the Strategic Director of City and Neighbourhood Services, subject to satisfactory terms being agreed and on condition that: <ul style="list-style-type: none"> <li>• the promoter resolves all operational issues to the Council's satisfaction;</li> <li>• an appropriate legal agreement is completed, to be prepared by the City Solicitor; and</li> <li>• the promoter meets all the statutory requirements of the Planning and Building Control Service including the terms and conditions of the Park's Entertainment Licence</li> </ul> </li> <li>3. Grant authority to the Strategic Director of City and Neighbourhood Services to negotiate an appropriate fee for the use of the facility taking into account the costs to Council, minimising negative impact on the immediate area but also the potential wider benefit to the City economy.</li> </ol>
<b>3.0</b>	<b>Key Issues</b>
3.1	<p>In November 2018, Committee approved five music events in Botanic Gardens over the period 21<sup>st</sup> - 28<sup>th</sup> June 2019, hosted by Aiken Promotions. This was subject to:</p> <ul style="list-style-type: none"> <li>• the promoter resolving all operational issues to the satisfaction of the Council;</li> <li>• an appropriate legal agreement was put in place between the Council and the promoter; and</li> <li>• the promoter meeting all the statutory requirements of the Planning and Building Control Service including the terms and conditions of the Parks Entertainment licence.</li> </ul>
3.2	<p>All of the above were completed to the satisfaction of the Council and the promoter complied with all aspects of the legal agreement and the entertainment licence.</p>

3.3	Approximately 20,000 people attended Botanic Gardens over the five days. There were six noise complaints received in total before, during and after; one pre-event enquiry. Only one complaint relating to music noise levels was received on the first day during sound checking. Officers monitored levels at front of house and spot checks were carried out at locations close to the venue. The noise conditions included in the licence agreement were adhered to throughout the event.
3.4	Events of this nature add to the profile of the city. There are also significant benefits to the City in terms of income generated from a series of events such as this in terms of income for shops, taxi companies, tourist venues, public transport, air, bus and rail companies.
3.5	There were two corporate complaints regarding the closure of the park during set up. Both complaints were responded to by email and after a satisfactory resolution, the cases were closed.
3.6	Corporate Communications considered social media feedback on the event. This suggested there was concern from regular users of the Gardens in relation to the Gardens being closed for set up during each event, the number of events and the timeframe of engagement. Positive elements of written feedback included better use of the park for everyone across the City to enjoy, good “buzz” about Botanic Avenue and fabulous venue.
3.7	In terms of public consultation, the Promoter attended the Holyland Pact meeting on 28 <sup>th</sup> May 2019. In addition, 1000 letters were distributed to households in the surrounding area ( <b>See Appendix 1</b> ). The Gardens were closed to the public at 3.00pm to allow for preparation for each music event.
3.8	The Gardens were cleared of litter every evening and were open to the public every morning at 7.30am, including the lawn area where the concerts were taking place. Lower Botanic Gardens was not affected by the events and remained opened throughout the period.
3.9	There were no incidences reported by the PSNI over the course of the events.
3.10	Members will also be aware that residents can raise concerns when the entertainment license is advertised for renewal. Any concerns would be considered by our Licensing Committee, should this be required.
3.11	The Promoter – Aiken Promotions is aware of concerns raised by local residents and would

	<p>be happy to attend Committee to discuss any concerns members may have. They have indicated that they would be willing to consider a clause in any future licence agreement that would require the genre of music event offered to be suitable to the urban environment.</p>
3.12	<p><u>Financial &amp; Resource Implications</u></p> <p>An appropriate fee was negotiated for the use of the facility taking into account the costs to Council and minimising the negative impact on the immediate area.</p>
3.13	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>There are no equality, good relations or rural needs assessments associated with this report.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1 –List of Concerts in Botanic Gardens



### Live at Botanic Gardens

**21, 22, 23, 27 and 28 June 2019**

We at Aiken Promotions are writing to inform you that we will be promoting a series of concerts at the Great Lawn in Botanic Gardens on the following dates.

Friday 21 June	Picture This
Saturday 22 June	Picture This
Sunday 23 June	Van Morrison
Thursday 27 June	Bros
Friday 28 June	Summer Celebration (A Country Music Show)

Our 'set-up' commences on June 17<sup>th</sup> and will continue up to the last concert. Take down will commence immediately after the concert on the 28 June and continue through to July 1<sup>st</sup>.

The concerts will be held in the open air with music commencing at approximately 18.00 except for Friday 28 June when it will start at 17.30. All concerts will finish at approximately 22.30. The maximum attendance at any event is 4,990 persons.

These events are intended to expand the entertainment offer for people who live in the city and to encourage visitors. Botanic Gardens is a tremendous environmental and cultural facility that is an unknown gem to many people. It is hoped these events will increase its profile and usage.

We are aware that for any event, even in a secluded location, there is potential for some exceptional impact on those living and working in close proximity. Aiken Promotions will do everything possible, in consultation with our statutory partners, to limit any impact. For example:

- There will be no queuing necessary. The park will close to general public access as follows  
21, 22, 23, 27 June 14.45  
28 June 14.15  
Patrons attending the events can queue inside the park from 17.00.
- The advice to patrons on getting to the events is to use public transport and we are working to promote the wide range of Translink services available. We will be strongly discouraging parking in the area.
- We have set up two dedicated means of contacting us if you have any concerns. These are:  
Telephone: 07594256405  
Email: [residents@aikenpromotions.com](mailto:residents@aikenpromotions.com)  
These services will be in operation from Monday 17 June until Sunday 30 June.
- Various advance multimedia announcements and publicity will also be in place well before the event to provide advice and information and to reinforce the parking arrangements.
- Security personnel will patrol the site and its environs.

The venue will be secured and patrolled by Eventsec Security personnel throughout the set-up arrangements and take down, as well as during each concert.

In preparation for the concerts, sound tests will take place at the following times:

20 June between 19.00 – 20.00

21, 22 and 23 June between 15.00 – 17.30

27 and 28 June between 13.00 – 14.00 and 16.00 – 17.00

Sound tests will not be continuous during the above times but are likely to be audible intermittently to allow equipment checks and to monitor sound travel from the venue.

The concert may generate music that may be heard in the surrounding area. As responsible event organisers, we will do everything possible to minimise noise disturbance and disruption to local residents. As part of the event you may also hear the announcements from the PA tannoy system. The PA may be audible particularly at the end of each event, but any announcements are required to relay essential information to the audience.

1. Audio Consultants are employed by us to manage sound levels.
2. Noise levels throughout the event will be continuously monitored in the surrounding neighbourhood.

If you have a query about noise and you wish to contact Belfast City Council to investigate further, you can contact the Noise Hotline on 02890373006.

Please note, when contacting the Noise Hotline, you may receive an automated message. This does not mean that your query will not be dealt with as Officers may be responding to other queries at the time of your call. Therefore, please leave your name, contact number and query and Officers will contact you as soon as they are available.

Please be assured that overall Management Plans for the event, together with arrangements for public access and security have been developed in consultation with the PSNI, Translink, relevant sections of Belfast City Council and other statutory bodies. It is also our intention to keep any disruption in the locality to a minimum.

Aiken Promotions and Belfast City Council will provide comprehensive cleansing operations within the immediate vicinity of the concert site immediately before, during and after the events.

Your business or residence has been identified as one which may experience some inconvenience and that is why you are being notified.

Thank you for your understanding co-operation and we look forward to a successful series of concerts.

Aiken Promotions



<b>Subject:</b>	Request for the use of Cathedral Gardens for “Rally for Choice”
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Ryan Black, Director of Neighbourhood Services
<b>Contact Officer:</b>	Brian McKinley, Events Officer Jackie Turkington, Community Parks Outreach Manager

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	Committee is asked to note that the Council has received a request from the organisation, Reclaim the Agenda to hold a ‘Rally for Choice’ in Cathedral Gardens from 13:00 – 17:00 on Saturday 7 September 2019. This event will require the closure of all or a substantial proportion of the site and will involve speeches by the Rally for Choice organisation.
<b>2.0</b>	<b>Recommendations</b>
2.1	The Committee is asked to; <ul style="list-style-type: none"> <li>Consider if it wishes to support the use of Cathedral Gardens on the 7 September 2019 to hold a ‘Rally for Choice’ event.</li> </ul>
2.2	If permission is granted to Reclaim the Agenda for this event to take place on 7 September 2019, it will be subject to the completion of the appropriate Event Management Plans and

	<p>satisfactory terms being agreed by the Strategic Director of City and Neighbourhood Services and on the condition that:</p> <ul style="list-style-type: none"> <li>the event organiser meets all statutory requirements including public liability insurance cover, health and safety and licensing responsibilities; and</li> <li>the event organiser shall consult with adjoining public bodies, the local community and the PSNI as necessary.</li> </ul>
<b>3.0</b>	<b>Main report</b>
3.1	<p><u>Key Issues</u></p> <p>Rally for Choice is part of the women's movement campaign to have reproductive healthcare that meets societies' needs within current service provision. This event will call for the Government to take action now and provide services here within the health service.</p>
3.2	<p>A small gazebo and stage will be erected in Cathedral Gardens and a sound system will be in operation and face painting will take place. Participants will gather on-site at 13:00 for speeches; at 13:30, there will be a march around the city returning to Cathedral Gardens around 14:00 -14:30 and the event will finish by 15:00.</p>
3.3	<p>The event organiser will seek permission from the Parades Commission and will liaise with the PSNI if any temporary street closures may be necessary.</p>
3.4	<p>The event organiser anticipates that approximately 1,000 people will be attending, stewards will be on duty but limited information has been provided on crowd control measures.</p>
3.5	<p>The event organiser has indicated that the event is supported by the women's movement, trade union movement, charities, many local community organisations, political parties and youth groups.</p>
3.6	<p>The event may require the closure of the park and no vehicular access will be permitted to Cathedral Gardens during event set-up/takedown.</p>
3.7	<p><u>Financial &amp; Resource Implications</u></p>
3.8	<p>No implications have been identified.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>We aim to promote equality of opportunity and good relations in the provision of all of our services and events such as this may evidence difference viewpoints, particularly in relation to gender and religious belief.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	<p>None.</p>



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<b>Subject:</b>	CIWM (NI) Conference 2019: <i>Life beyond Plastics?</i> - 24 October 2019 – Titanic Belfast
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director of City & Neighbourhood Services
<b>Contact Officer:</b>	Tim Walker, City Services (Resources & Fleet) Manager, Jennifer Stephens, Compliance & Research Officer

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	The Chartered Institution of Wastes Management (CIWM) (NI) is holding its biannual conference on 24 October 2019 in Titanic Belfast this year. The title of this conference is " <i>Life Beyond Plastics?</i> "
2.1	In light of the Council's ongoing work implementing the Waste Framework, developing its approach to the Circular Economy (Resourceful Belfast), the Blue Planet effect, changes to the international marketplace for the sale of recyclables, Members are asked to approve the attendance of Members at this event. It should be noted that senior officers will also be in attendance.
<b>2.0</b>	<b>Recommendations</b>
	The Committee is requested to;

	<ul style="list-style-type: none"> <li>• approve the Chair and Deputy Chair (or their nominees) to attend this event, and the speakers' dinner on the preceding evening.</li> </ul>				
<b>3.0</b>	<b>Main report</b>				
	<u>Key Issues</u>				
3.1	This year's CIWM (NI) Conference offers a line-up of expert speakers. It will be one of the biggest gatherings of its kind and will welcome key decision makers and stakeholders within the Circular Economy agenda, from product designers and waste producers to council officers and recycling champions.				
3.2	This engaging programme will be concentrating on the themes of disruption and the Circular Economy with a particular focus on plastics and the plastics recycling journey.				
3.3	Organised by the CIWM (NI) centre council, the conference will take place at the Titanic Belfast. The Keynote Speaker is Sir Tim Smit KBE, co-founder of the Eden Project in Cornwall. Mr Smit will talk about the NI Eden Project planned for the banks of the river Foyle in Derry/Londonderry extending from Foyle Bridge towards Culmore Point, based around the old stately homes of Boom Hall and Brook Hall. The intention is to create new educational opportunities for a diverse range of students, and Queen's University Belfast and Ulster University are co-operating on the project. The initiative aims to link the two estates, including previously inaccessible river frontages, to support regeneration in the city.				
3.4	The programme will also include a line-up of speakers from DAERA, CIWM, QUB, ICPEN, Denroy Plastics and others about actions and initiatives happening in NI in relation to resources and in particular, plastics.				
3.5	This year the Speakers Dinner, to be held in the Titanic Hotel the night preceding the conference, will be open to all CIWM Members. The Council is an associate member of CIWM.				
	<u>Financial &amp; Resource Implications</u>				
3.6	<p><b>Delegate packages and prices:</b></p> <table> <tr> <td>Conference Delegate Rate Only (includes lunch)</td><td>£95.00 + VAT</td></tr> <tr> <td>Speakers Dinner* &amp; Conference Delegate Rate</td><td>£145.00 + VAT</td></tr> </table>	Conference Delegate Rate Only (includes lunch)	£95.00 + VAT	Speakers Dinner* & Conference Delegate Rate	£145.00 + VAT
Conference Delegate Rate Only (includes lunch)	£95.00 + VAT				
Speakers Dinner* & Conference Delegate Rate	£145.00 + VAT				



	<p>* 4 course dinner &amp; drinks reception in Titanic Hotel, limited places</p> <p><u>Equality / Good Relations or Rural Needs Assessment Implications</u></p>
3.7	There are no relevant equality, good relations or rural need assessment issues associated with this report.
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	Appendix 1 - Draft Programme Agenda for 24 October

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CIWM

# Northern Ireland Centre

## The Future for Plastics?

24th October 2019

08:45 – 09:30 Registration – Opportunity for networking and exhibition viewing.

### Session 1: Welcome, Introduction & Disruption

09:30 – 10:00 Enda Kiernan – President, CIWM

10:00 – 10:25 Denis McMahon – Permanent Secretary, Department of Agriculture, Environment and Rural Affairs (DAERA)

10:25 – 10:50 **KEY NOTE SPEAKER**

Sir Tim Smit KBE – Co-founder of the Eden Project, Executive Vice Chair of Eden Project Ltd and Executive Chairman of Eden Project International Ltd

*Break – Opportunity for networking, refreshments and meeting exhibitors*

### Session 2: Extinction or Rebellion? What we are facing?

11:00 – 11:25 John Barry – Queen's University Belfast

11:25 – 11:50 **TBC – Tim Walker Progressing**

11:50 – 12:15 Keith Patterson – WRAP Northern Ireland *Behavioural Change*

12:15 – 12:30 Questions & Answers Session facilitated by Max Carnson (CIWM NI & McQuillan Envirocare Ltd)

*Lunch – Opportunity for networking and meeting exhibitors over lunch.*

### Session 3: The Plastics Journey

13:30 – 13:50 Paul Vanston – CEO, Industry Council for Packaging & the Environment (INCPEN)

13:50 – 14:10 Nick Cliffe – Head of Advanced Materials at Innovate UK

14:10 – 14:30 **Edward Kosior – Nextek Ltd TBC Celine Grant progressing**

14:30 – 14:50 Noel Bloomfield, Quality Manager - Denroy Plastics

14:50 – 15:10 **Space to be filled – Debbie Nesbitt progressing**

15:10 – 15:30 **Space to be filled – Neil McCauley progressing**

15:30 – 15:50 Questions & Answers Session facilitated by **Debbie Nesbitt / Alison Curtis / Celine Grant**

15:50 – 16:00 Adrian Thompson – CIWM Northern Ireland Centre Council Chair (Summary & Close)

**Potential Speakers: Diageo ABP / Musgraves / Gerry McNally – Director of Research Innovation and Competence at Northern Ireland Polymers Association**

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<b>Subject:</b>	Update on Green Flag and Green Flag Heritage Award
<b>Date:</b>	6 August 2019
<b>Reporting Officer:</b>	Nigel Grimshaw, Strategic Director, City and Neighbourhood Department
<b>Contact Officer:</b>	Ryan Black, Director, City and Neighbourhood Services

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

☐

After Council Decision

☐

Some time in the future

☐

Never

☐

## Call-in

Is the decision eligible for Call-in?

Yes

☒

No

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<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	To update Members of the recent success in achieving 20 Green Flags and a Green Flag Heritage Award.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to;</p> <ul style="list-style-type: none"> <li>Note the contents of the report.</li> </ul>

<b>3.0</b>	<b>Main report</b>
	<u>Key Issues</u>
3.1	<p>20 Belfast City Council parks, playing fields and Roselawn Cemetery were Green Flag judged over the summer of 2019. The judging criteria for the green flag award is based on 8 elements:</p> <ul style="list-style-type: none"> <li>• A welcoming place</li> <li>• Healthy, safe and secure</li> <li>• Well maintained and clean</li> <li>• Environmental management</li> <li>• Biodiversity, landscape and heritage</li> <li>• Community involvement</li> <li>• Marketing and Communication</li> <li>• Management, including 5-year action plan</li> </ul>
3.2	<p>The Heritage Award is based on 3 elements:</p> <ul style="list-style-type: none"> <li>• Condition of historic features</li> <li>• Use and enjoyment of historic features</li> <li>• Maintaining historic character &amp; appearance</li> </ul>
3.3	<p>All 19 Parks and 1 cemetery were awarded Green Flag status with one site also being awarded the special accolade of Green Flag Heritage award status which incorporates the Green Flag Award. This year is the tenth anniversary of Belfast City Council achieving its first award in 2009 with the number of parks achieving the award, growing year on year since then. This is a tremendous achievement and staff were thanked for their hard work and efforts to achieve Green flag status in so many locations.</p>
3.4	<p>The 20 Parks, Playing Fields and Cemetery awarded Green Flag are:</p> <ul style="list-style-type: none"> <li>• <b>Barnett Demesne</b></li> <li>• <b>Belmont Park</b></li> <li>• <b>Botanic Gardens</b></li> <li>• <b>Cavehill Country Park</b></li> <li>• <b>Connswater Community Greenway</b></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Drumglass Park</b></li> <li>• <b>Dunmurry Park</b></li> <li>• <b>Dunville Park</b></li> <li>• <b>Falls Park</b></li> <li>• <b>Grove Playing Fields</b></li> <li>• <b>Half Moon Lake</b></li> <li>• <b>Knocknagoney Linear Park</b></li> <li>• <b>Lagan Meadows</b></li> <li>• <b>Musgrave Park</b></li> <li>• <b>Ormeau Park</b></li> <li>• <b>Roselawn Cemetery</b></li> <li>• <b>Sir Thomas and Lady Dixon Park</b></li> <li>• <b>Tullycarnet Park</b></li> <li>• <b>Waterworks</b></li> <li>• <b>Woodvale Park</b></li> </ul>
3.5	<p>Members are asked to note that the Connswater Community Greenway includes the full extent of the 15 kilometres and Victoria and Orangefield Parks, and that Botanic Gardens has received recognition for the opening of the Tropical Ravine with a prestigious Heritage Award.</p> <p><u>Financial &amp; Resource Implications</u></p>
3.6	<p>The cost of managing, maintaining and improving the parks to maintain Green Flag status are included within current revenue estimates. There is a charge of approximately £500 to have each park judged. This is also included within current revenue estimates.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.7	<p>There are no equality, good relations or rural needs implications associated with this report.</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
	None

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