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## **WASTE SERVICES – COMMUNITY RECYCLING CENTRE TRADE ACCESS POLICY**

**Report by Service Director Neighbourhood Services**

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### **SCOTTISH BORDERS COUNCIL**

**12 NOVEMBER 2015**

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#### **1 PURPOSE AND SUMMARY**

- 1.1 This report recommends the approval of a Community Recycling Centre Trade Access policy for Scottish Borders Council.**
- 1.2 The aim of the Community Recycling Centre (CRCs) Trade Access Policy is to expand on the existing range of trade services by providing small, peripatetic traders with a cost effective and legislatively compliant means to dispose of the bulk of their waste and recycling. The proposal would aim to allow SBC to provide an improved and sustainable service that would contribute towards the current costs of trade waste disposal at CRCs.
- 1.3 CRCs are currently licenced to accept household waste only. However, it is suspected that some traders gain regular, unauthorised access to dispose of their waste. To resolve this, the options available are to either enforce a trade ban at CRCs or introduce the proposed permit system. Both of these options will incur costs to manage and enforce. The option of introducing a permit system however, would result in an income stream which could cover the management and enforcement costs and may contribute towards some of the trade waste treatment and disposal costs.
- 1.4 A key aim is to ensure that any system is simple and sustainable, therefore, after extensive consultation and research, it is proposed that a two permit scheme be introduced to allow traders access to six of the Council's Community Recycling Centres, the exception being Selkirk.
- 1.5 CRCs have been designed for household waste only and their current design, size, capacity and operational activities are such that the permit system should be introduced with the proposed material, vehicle, access and volume restrictions initially.
- 1.6 A review of the system will be undertaken after three months. Depending on the outcome of the review it may be possible to relax or remove some of the restrictions in place and for further improvements to be made to the new service.

- 1.7 Applications for either of the permits will be via an online form with legal checks and full payment included as part of the application process. This proposal is to introduce the new service from 1<sup>st</sup> April 2016 which aligns with the timescales for renewing the existing trade waste service contracts.

## **2 RECOMMENDATIONS**

### **2.1 I recommend that the Council approves:**

- (a) the introduction of a Trade Waste Access Policy for six of the Community Recycling Centres in the Scottish Borders Area.**
- (b) the proposed two permit scheme with material, vehicle, access and volume restrictions along with the associated fees.**
- (c) the need for a full time permanent enforcement role to manage the system and provide support for operational staff and site users.**
- (d) expenditure incurred for implementation and ongoing costs as summarised in Appendix 1a.**

### **3 BACKGROUND**

#### **3.1 Drivers**

The implementation of the previous Integrated Waste Management Strategy (IWMS) had been identified as a key Business Transformation Project which was programmed to save £800k by 2017/18, contributing significantly to the £28 million savings target the Council has over this period. As part of that IWMS it was agreed to undertake a review of Community Recycling Centre (CRC) provision to ensure it is fit for purpose and financially sustainable in the long term.

3.2 Part of that review was to improve current service provision to traders and to develop a chargeable trade access policy at CRCs. Services currently available to traders include a chargeable kerbside collection service for both residual waste and recyclables, a bulky uplift service and weighbridge facilities at Galashiels, Hawick and Eshiels where landfill tax and disposal charges apply.

3.3 Currently waste disposed of at CRCs by traders cannot be identified, leaving the Council liable for the costs of disposal or recycling. Under the Waste (Scotland) Regulations 2012 businesses are legally responsible for safely disposing of any waste they produce and to take all reasonable steps to recycle as much of that waste as possible.

### **4 PROPOSED SCHEME**

#### **4.1 Research**

Of the 32 Local Authorities in Scotland, 15 allow traders access to their recycling and/or disposal facilities at a cost and 6 enable the recycling permit to be added to the trade collection contract for existing customers, free of charge. The other 11, including SBC, restrict access to householders only. The current CRCs in Scottish Borders were designed specifically for the acceptance of household recyclables and residual waste only and therefore do not have the capacity to accept large amounts of trade waste.

4.2 Extensive research was carried out on the various schemes currently in operation in those 21 Authorities. These ranged from issuing permits, books of vouchers, chip and pin, advanced booking and use of weighbridges. Refer to Appendix 3 for further information.

#### **4.3 Assessments**

Impact assessments were carried out on the different charging levels, payment types and schemes currently in use by the 21 Authorities. Refer to Appendices 4a, 4b, and 4c.

After assessing the pros and cons of the various schemes it is proposed that a chargeable two permit scheme be introduced for traders to access Scottish Borders Council's Community Recycling Centres.

#### **4.4 Restrictions**

Taking the limited capacity of the Council's sites into consideration, to minimise complaints from other site users over queuing and inconvenience when a trader is off-loading, it is proposed to allow access to certain vehicles only. In this way, the amounts of rubble, soil, stones, garden and landfill waste accepted will be restricted. Refer to Appendix 6a and 6b. Unlimited amounts of most recyclables will however be allowed thereby assisting traders in complying with the aforementioned Regulations.

#### 4.5 Permits

Each permit will be valid for a period of one year from the date of issue. Permits will be specific to one vehicle and will be non-transferrable, however, the permit may be reassigned if a new vehicle is purchased. An administration charge will be made for this process. Permits will only be issued to traders who have a business address within the Scottish Borders boundary.

Two types of permit will be available:

- Recycling
- Green, Construction and Recycling.

Each permit will be colour coded A5 and highlight the vehicle registration, expiry date and will contain a SBC hologram to avoid fraudulent duplication. Refer to Appendix 2 for copies of draft permits.

#### 4.6 Recycling Permit

This would be for dry mixed recyclables (paper, card, cans and plastics), scrap metal and wood. There would be no restriction on the volume of recyclable materials accepted or number of visits to the Recycling Centres. This would be priced at £340.00 per annum. Refer to Appendix 2.

#### 4.7 Green, Construction and Recycling permit

This would be for garden waste, landfill, soil and rubble and recyclables. As in 4.6 unlimited amounts of recyclable materials will be accepted however only a limited amount of garden, construction and landfill waste will be accepted. Visits to the CRCs would be limited to four bags (approximately 30 litres each) or equivalent, supplied by SBC, once per day for garden, construction and landfill waste. This would be priced at £875.00 per annum. Refer to Appendix 2.

#### 4.8 Costs

The table below summarises the number of businesses with a combined general waste and recycling kerbside collection contract and the range of costs incurred (based on a full year 52 weeks).

<b>Cost to the business</b>	<b>Number of Contracts</b>
< £300	101
≥ £300 and < £500	74
≥ £500 and < £1000	141
≥ £1000 and < £2000	94
≥ £2000 and < £3000	13
≥ £3000	25
Total number of contracts	448
> £875	151

To support the view that the proposed CRC permit costs are not unreasonable, the above table demonstrates that many businesses are already paying more than the proposed permit costs via a kerbside collection contract.

The table below compares the proposed CRC Green, Construction and Recycling Permit with various kerbside contract scenarios and their costs.

<b>Proposed CRC Green, Construction &amp; Recycling Trade Permit</b>				
<b>General Waste</b>	<b>Cost</b>	<b>Recycling</b>	<b>Cost</b>	<b>Total Cost</b>
4 sacks per day x 5 days / wk. 120 litres of landfill waste per visit, (600 litres per week)	-	Unlimited recyclables including metal and wood	-	<b>£875</b>
<b>Compared to</b>				
<b>Kerbside trade contracts</b>				
<b>General Waste</b>	<b>Cost</b>	<b>Recycling</b>	<b>Cost</b>	<b>Total Cost</b>
1 x 360 litre bin. emptied once week	£253	Large Contract (650 sacks – approx. 12/week)	£481	£734
1 x 660 litre bin emptied once week	£510	Medium Contract (350 sacks - approx. 7/week)	£251	£761
1 x 1100 litre bin emptied once week	£791	Small Contract (150 sacks – approx. 3/week)	£96	£887

It should be noted that

- the kerbside general waste contract allows landfill waste only and does not allow any construction materials.
- the kerbside recycling contract allows paper, card, cans and plastics only and does not include wood, metal or green waste.

The introduction of a CRC permit scheme should therefore enhance and improve on SBC's current services to Border's businesses, supply a compliant disposal route that is currently not available for smaller, mobile businesses and at a reasonable cost.

We would aim to review trade services and pricing structures to maximise take up, provide businesses with good value whilst meeting both the Council's and a business's legislative duties and cover service costs.

## **5 OPERATION OF SCHEME**

### **5.1 Access**

Traders would be allowed access to Galashiels, Hawick, Eshiels, Duns, Eyemouth and Kelso CRCs, Monday to Friday between the hours of 9.00am and 4.30pm. A review of these access times (which will include getting feedback from businesses) will be undertaken after three months and consideration given to any changes required.

Permits must be prominently displayed on the vehicle windscreen on entry to the CRC.

Due to the proximity of Galashiels and Hawick, capacity issues and the cost of double handling of the waste, trade access will not be allowed at the Selkirk CRC.

## 5.2 Vehicle Restrictions

SBC's Community Recycling Centres are generally small and designed to accept waste from households only and therefore have a limited capacity to accept large amounts of waste. Also larger vehicles can cause the sites to become congested and these are excluded from the permit scheme.

For example, vehicles over 3.5 tonnes gross vehicle weight, trailers over 6 foot by 4 foot and vehicles with tail lifts. Refer to Appendix 6a for some examples of vehicles not allowed under this scheme and Appendix 6b for examples of vehicles allowed under the scheme.

## 5.3 Start date and application for permit and payment

The new scheme would start from 1<sup>st</sup> April 2016 and applications for permits will be via an online form with full payment by debit or credit card as part of the process.

For those who do not have access to online facilities, the application can be completed using the public access computers at the Council's contact centres or by contacting Customer Services who will complete the form with the customer by telephone.

## 5.4 Issue of permits

The completed application will be sent electronically to the Trade Waste team to issue the permit. As part of the application traders must verify they are legally entitled to carry/transfer waste by quoting the relevant Scottish Environment Protection Agency licence details. This will be verified by the Trade Waste team prior to issue of permit(s). The target for issuing permit(s) will be three to five working days after receipt of application.

## 5.5 Site operations

Feedback from other Local Authorities and CRC operational staff indicate that a key element of managing the scheme would be the installation of height and exit/entry barriers. It is proposed to install these barriers in financial year 2016/17.

## 5.6 Resource

Research of other Local Authority schemes indicate that having a dedicated resource in place to manage the scheme and support the operational staff was key to that scheme being successful.

A permanent member of staff would therefore be engaged to introduce and manage the scheme, engage with businesses and promote the new service, address any abuse of the scheme by traders and to support operational staff.

It is proposed that temporary staff would also be employed over a two week period when the system is first introduced. This would essentially be a two week grace period for businesses and a time where additional staff would be available to make them aware of the new trade access policy and advise how they can go about getting a permit.

Although take up by traders is not known at this time, it is estimated that income levels likely to be generated, (given research of trade take up in other Local Authority permit schemes), will provide funding for this post, refer to Appendix 1b.

## **6 IMPLEMENTATION**

### **6.1 Communications**

As part of the implementation a Communications Plan will be put in place. A key part of communications will be raising awareness with householders of the new trade access policy and the days / hours the sites will be accessible to traders. Information leaflets outlining the proposed scheme will be distributed at the centres to all those driving commercial type vehicles prior to the scheme going live. The scheme will be introduced simultaneously to all sites from 1<sup>st</sup> April 2016.

### **6.2 Resource**

Research of other local authorities indicates that despite best efforts, there is no scheme that is 100% successful in stopping traders using CRCs. A key element to maximising success and making any scheme worthwhile however is having a permanent dedicated resource available other than CRC operational staff to manage the scheme.

As per 5.6 above, both a full time permanent post is deemed essential for the management of the new system as well as additional, temporary, resource over a two week period when the system is first introduced.

### **6.3 Review**

It is proposed that a regular ongoing review of the scheme and operational impacts be carried out together with further consultations with service users and staff with adjustments being made to adapt and improve the service as required.

A specific review of the 9.00am-4.30pm access hours for traders will take place after 3 months and any alterations considered if required.

## **7 IMPLICATIONS**

### **7.1 Financial**

Currently some traders can gain unauthorised access to the Community Recycling Centres to dispose of waste. This results in the Council bearing the cost of disposal to landfill, via landfill tax, VAT and non-collection of disposal charge, or the cost of onward processing of recyclables. With the introduction of a reasonably charged permit scheme the possibility would exist for the Council to recover some of the disposal costs it currently bears. However this would be dependent on the level of take up by traders.

- (a) It is estimated that the start-up costs for the introduction of a trade waste access policy in year 2015/16 would be £28k with recurring costs thereafter of £30k per annum. Detailed breakdown of costs in Appendix 1a.
- (b) Estimating a minimum take-up of 42 of each of the permit types would give an income of £51k for a full year. This represents 2% of available businesses operating in the SBC area not currently using the Council's commercial kerbside collection service. Refer to Appendix 1b for how the number of permits has been calculated.
- (c) A Project Business Case will be prepared for capital funding to install height restricting and entry/exit barriers in 2016/17 to the value of £44k.

## 7.2 Risk and Mitigations

Full consideration has been given to possible risks, impacts and mitigating actions have been identified wherever possible. Refer to Appendix 4.

These include the capacity of the sites in handling additional waste and consequently having to close sites more often to service skips, householders having to queue while traders offload and a possible increase in the amount of fly tipping.

There is also the risk of introducing an overly complex and costly scheme which would not have the desired effect of encouraging traders to use our facilities and therefore denying SBC of an opportunity to raise additional income. Refer to Appendices 4b, 4c and 4d which show impact assessments relating to charging levels, payment types and system types.

To ensure risks are anticipated and minimised as far as possible, the scheme will be reviewed regularly once introduced and mitigations updated as further information becomes available.

A summary of the key risks (Appendix 4) is noted below:

- (a) Complaints from householders who are having to queue and generally are inconvenienced at the CRCs by the introduction of traders.

To mitigate this risk, Officers initially proposed that traders be allowed access Monday to Friday, between the hours of 10.00am and 4.00pm.

Following feedback from Members, the access times being proposed are now 9.00am to 4.30pm. This will be reviewed after 3 months of operation.

Allowing access only on week days, allows weekends to be exclusively for householders and ensures operations at each site are possible with minimum disruption to site users, minimum need for site closures to change over skips and reduces the likelihood of complaints.

For the green, construction and landfill waste permit, it is proposed that traders are restricted to access once per day and that there is a restriction on the amount of waste accepted per visit (four hessian sacks, or equivalent, supplied by Scottish Borders Council).

- (b) A large amount of additional waste may create operational difficulties in servicing the sites, with containers filling quicker and requiring the sites to be closed more often. Mitigating actions are as per 7.2(a) above.
- (c) A low uptake of the permit scheme would pose a risk to it being self-financing and its potential to contribute to the costs of disposal currently being carried by SBC. Careful consideration was given to setting the charges for these permits so that it would not be unaffordable to the traders who the Council is aiming to provide the service for.
- (d) Increased fly-tipping could be a result of the introduction of this scheme. This has been discussed in detail with Neighbourhood Operations Managers and it is considered that the existing processes for addressing fly-tipping currently would be adequate to deal with this matter. This situation would be regularly monitored however and actions taken as required. The permanent CRC resource would also be able to help mitigate this risk by actively engaging with businesses



to maximise take up of the CRC trade access scheme.

- (e) Non-permit schemes operated by other Local Authorities in Scotland, including books of vouchers or permit plus booking systems relied on substantial back-office systems to administer them. Introducing similar type schemes to SBC would make them less efficient and more costly therefore diminishing the possible income. By proposing a two permit scheme with payment as part of an on-line application, the back-office tasks and associated costs are kept to a minimum.

### **7.3 Equalities**

- (a) An initial impact assessment has been completed (see Appendix 7). At this stage it is anticipated to have an overall positive impact on meeting the Equality Duty. Further assessment will be conducted through implementation to ensure this is achieved.
- (b) It is anticipated that there are no adverse impacts due to race, disability, gender, age, sexual orientation or religion/belief arising from the proposals in this report.

### **7.4 Acting Sustainably**

There are no significant impacts on the economy, community or environment arising from the proposals contained in this report.

### **7.5 Carbon Management**

There are no significant effects on carbon emissions arising from the proposals contained in this report.

### **7.6 Rural Proofing**

Access to CRCs for traders is anticipated to have an overall positive impact for businesses operating in rural areas as this service is provided in addition to existing trade collection and weighbridge offload services. The only possible negative affect is that Selkirk CRC is not open to traders and those operating in this area will have to drive to one of the other 6 CRCs that allow admittance. See Appendix 8.

### **7.7 Changes to Scheme of Administration or Scheme of Delegation**

There are no changes to be made to either the Scheme of Administration or the Scheme of Delegation as a result of the proposals contained in this report.

## **8 CONSULTATION**

- 8.1 The Chief Financial Officer, the Monitoring Officer, the Chief Legal Officer, the Service Director Strategy and Policy, the Chief Officer Audit and Risk, the Chief Officer HR, and the Clerk to the Council have been consulted and their comments have been incorporated into the final report.
- 8.2 The Corporate Equalities and Diversity Officer was consulted with regard to carrying out an Equality Impact Assessment.  
  
Consultations were held with the Corporate Communications team to deliver an information package regarding the introduction of a trade access policy for traders.
- 8.3 A consultation exercise was carried out with the business community in Scottish Borders which showed that the majority who responded would welcome the introduction of a trade waste policy that allowed access to the

Community Recycling Centres. For a summary of the consultation refer to Appendix 5.

- 8.4 Extensive consultation was held with all other Scottish Local Authorities, particularly rural Authorities, on the schemes they currently operate for disposal of trade waste and recyclables. There proved to be various charging schemes in place and also restrictions on site access. For details of these schemes refer to Appendix 3.
- 8.5 Consultations were also carried out with Councillors, current Community Recycling Centre staff and Trade Unions which required further information on other rural Authorities, impacts and mitigations. These have been incorporated into the report.
- 8.6 If approved consultations will continue with traders and CRC staff to review and adapt/improve the policy where possible. Updates on the policy will be provided via the Area Forums.

**Approved by**

**Service Director Neighbourhood Services Signature .....**

**Author(s)**

Name	Designation and Contact Number
Rob Orr	Waste Strategy Technician 01835825000 Ext5630

**Background Papers:** Delivery of an Integrated Waste Management Strategy  
**Previous Minute Reference:** Scottish Borders Council 12<sup>th</sup> December 2013

**Note** – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Jacqueline Whitelaw can also give information on other language translations as well as providing additional copies.

Contact us at Jacqueline Whitelaw, Place, Scottish Borders Council, Council Headquarters, Newtown St Boswells, Melrose, TD6 0SA, Tel 01835 825431, Fax 01835 825071, email [eitranslationrequest@scotborders.gov.uk](mailto:eitranslationrequest@scotborders.gov.uk)

## Appendix 1a

### COSTS OF INTRODUCING TRADE ACCESS PERMIT SYSTEM

	2015/16 Implementation £	2016/17 Recurring Revenue £	2016/17 Capital £
Height Restrictors & Barriers	-	-	44,000
SEPA Licences	7,650	-	
Resource *	18,000	29,800	
Administration & PR	2,350	200	
<b>TOTAL</b>	<b>28,000</b>	<b>30,000</b>	<b>44,000</b>

#### Resource\* summary:

##### 2015/16

cost of temporary resource for a two week introduction period

cost of permanent resource to prepare and implement then manage the scheme

##### 2016/17

annual cost of permanent, full-time post to manage the system & permit re-issue costs

## Appendix 1b


## Income potentials based on permit purchase

There are approximately 5,300 businesses in the Borders with currently 1,100 contracted to receive a trade waste collection service from SBC.

This leaves approximately 4,200 businesses operating in the area either with other private collection or disposal contracts in place or with no contracts in place at all.

Based on the charges recommended, the undernoted table indicates potential annual income levels for 1%, 2% and 3% total take-up of a permit presuming half taking the recycling permit and half taking the Garden, Construction & Recycling permit.

Permit Purchase	Permit Type		Total Income
	Recycling - £340 each	Green, Construction & Recycling - £875 each	
21 each = 1% of businesses with no SBC contract	£7,140	£18,375	<b>£25,515</b>
42 each = 2% of businesses with no SBC contract	£14,280	£36,750	<b>£51,030</b>
63 each = 3% of businesses with no SBC contract	£21,420	£55,125	<b>£76,545</b>

1015	R
SM11 FYF	

**SBC Trade Recycling Centre Permit**

**Recycling Permit**

Please note that only the following materials can be accepted for disposal using this permit:  
Dry, mixed recyclables (paper, card, cans and plastics), scrap metal and wood (clean and free from attachments).

	RECYCLABLES - PAPER, CARD, CANS & PLASTICS	METAL	WOOD
GALASHIELS, HAWICK, ESHIELS, DUNS, EYEMOUTH & KELSO	✓	✓	✓
✓	UNLIMITED AMOUNT PERMITTED TO CRC		

**The following vehicles will not be allowed admittance:**

- Trailers over 6ft x 4ft
- Vehicles over 3.5 tonnes (gross vehicle weight)
- Agricultural vehicles (tractors)
- Tippers or tail-lifts
- Horseboxes
- Motorhomes

All waste must be pre-sorted prior to arrival on site. No other waste permitted.

Trade Waste Permits must be displayed at all times when using the Community Recycling Centres. Scottish Borders Council reserve the right to restrict access to any vehicle on a site-by-site basis if a valid permit is not on view.

**Opening Hours:**  
Monday to Friday 10.00am-4.00pm

**Contact:**  
Trade Waste  
Tel: 01835 825111  
Email: [tradewaste@scotborders.gov.uk](mailto:tradewaste@scotborders.gov.uk)  
[www.scotborders.gov.uk/recycling](http://www.scotborders.gov.uk/recycling)

**Please note:** Opening hours have been changed to Monday to Friday 9.00am-4.30pm.

1015	GCR
SM11 FYF	

### SBC Trade Recycling Centre Permit

#### Green, Construction & Recycling Permit

Please note that only the following materials can be accepted for disposal using this permit:

Green garden waste, rubble, soil and stones, scrap metal, wood (clean and free of attachments), waste for landfill and dry mixed recyclables – paper, card, cans and plastics.

	RECYCLABLES - PAPER, CARD, CANS & PLASTICS	METAL	WOOD	GARDEN	RUBBLE, SOIL & STONES	LANDFILL
<b>GALASHIELS, HAWICK, ESHIELS, DUNS, EYEMOUTH &amp; KELSO</b>	✓	✓	✓	✓	✓	✓

✓	UNLIMITED AMOUNT PERMITTED TO CRC
✓	LIMITED AMOUNT PERMITTED; MUST BE BAGGED; 4 SBC HESSIAN BAGS MAX PER VISIT; SINGLE VISIT PER DAY

**The following vehicles will not be allowed admittance:**

- Trailers over 6ft x 4ft
- Vehicles over 3.5 tonnes (gross vehicle weight)
- Agricultural vehicles (tractors)
- Tippers or tail-lifts
- Horseboxes
- Motorhomes

All waste must be pre-sorted prior to arrival on site. No other waste permitted.

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**Opening Hours:**

Monday to Friday 10.00am-4.00pm

**Contact:**

Trade Waste  
Tel: 01835 825111  
Email: tradewaste@scotborders.gov.uk  
www.scotborders.gov.uk/recycling

**Please note:** Opening hours have been changed to Monday to Friday 9.00am-4.30pm.



**Other Local Authorities - Trade Access Systems Operated****Nos. Local Authorities allowing trade access: 21****No. Local Authorities NOT allowing trade access: 11 (incl. SBC)**

<b>Type of System</b>	<b>Charging</b>	<b>Conditions</b>	<b>Nos. of Local Authorities*</b>
<b>Permit</b>	Recycling Permit added to trade collection contract for existing customers (free of charge).  Standard Ticket/Permit - £110-218; Construction/Green Waste Ticket/Permit - £543-780 or £22/tonne either by weighbridge tickets or using a ready reckoner. Each application includes admin fee of £37.50 (all prices incl. VAT).	No added income generated.  Certain materials e.g. Landfill waste not included in permit. Access limited to a few sites only. Separate full-cost permit for each trailer. High levels of competition from private contractors pushes down price in certain areas e.g. Fife.	6  4
<b>Permit &amp; Book</b>	Can book a 20 minute slot to dispose of waste.	Inconvenient for traders who cannot visit when it suits them.	1
<b>Voucher/Ticket per visit</b>	Trade Waste voucher costs £13-138 depending on vehicle size or weight of material disposed of. One offers a book of 20 tickets for £29.30 for recyclates.	Copy of ticket handed in at site and copy retained by trader. High levels of administration involved for single-operator sites.	5
<b>Chip &amp; Pin</b>	£103.50/tonne if using chip and pin, and £115/tonne if invoiced. (+£50/WTN).	Ideal system but expensive to implement (used by Edinburgh)	1
<b>Weighbridge &amp; Pay</b>	Waste Transfer Note/delivery £25-252/ tonne depending on material type disposed of (recyclate cheapest and special waste most expensive).	Most accurate way of ascertaining disposal amounts but very expensive system for traders.	7
<b>Total</b>			23

\*Highland operates 3 different systems.



**Risk / Impact Assessment**

<b>Risk</b>	<b>Impact</b>	<b>Mitigating Actions</b>	<b>£ Mitigating Actions</b>
Queues at CRCs	Complaints	-Access 6 sites every day during the week -Trader access restricted to Mon-Fri, 10am-4pm -Currently coming in and coping	-CRC Officer / Business Support trade team / Waste Services
Containers full / capacity problems	-Complaints -Site closures -Operational issues – skips need emptying more frequently	-Operational review – implement based on staff knowledge and experience -Restrictions / limits on certain materials	-CRC Officer -Monitor / review / revise
Increased fly tipping	-Costs to Council to deal with -Aesthetics / environmental impact	- SEPA meeting already held - Neighbourhood Operations meeting already held - Regular monitoring and communications with N/Ops Managers - Actions as required - Annual review of CRC charges - Engagement with businesses / Duty of Care (DoC) / education / awareness raising	-CRC officer to engage with businesses and maximise take up of permit - Neighbourhood Services system already in place to address fly-tipping -Enforcement – actions /options to be investigated (N/Ops, Safer Comms & Env H links) -Repeat business consultation exercises / awareness raising
Low uptake of permits (due to cost? Due to inconvenience?)	-Fly tipping -Little/no income -Continued CRC trade abuse	-‘Reasonable’ charges (research other LA charge levels; baseline – SBC costs to dispose of) -Keep the system simple - Regular business engagement, education, awareness raising via Business Gateway, Chamber of Commerce, re. DoC, etc Inform and educate re DoC & individual – door-knocking -Business consultations – ask re frequency of visits / staff records - Monitor, review and revise charging	-CRC Officer & other resource (Waste Services / Trade Waste / Business Support)
Estimated frequency of	-Skips get full quickly at certain CRCs	-Other LA views -Business consultation exercises results	-Monitor by CRC Officer -Adapt load amounts

visiting a CRC – to be considered	-Queuing	-Business consultation / once in place – frequency of visiting	-Increase skips/capacity?
Risk of diverting kerbside & weighbridge customers to permit system	-Potential loss of income from kerbside & weighbridge	-Currently only a very small number of large businesses use weighbridge -Pricing such that businesses would be better retaining kerbside collections of some materials; convenient -Monitor, review and revise as required	-Resource in place to monitor (CRC staff, Waste Services, Trade Waste, Business Support & CRC Officer)
Admin system too complex	-Time-consuming -Resource intensive -Costly -Has an impact on the customer experience	-Keep simple and streamlined initially -Online payments in lump sum to ensure income -Monitor, review and revise always an option (annually)	-Trade waste team to administer
Traders accessing all CRCs at weekends and Selkirk Mon-Fri	-Complaints from householders -Operational issues – skips need emptying more frequently -Queuing -Health & safety issues	-CRC Officer monitoring unauthorised access -Temporary agency operatives employed to provide support during introductory period of Permit system	-CRC Officer -Agency fees for temp staff

**Trade Permit - Charging Impact Assessment**

**Appendix 4a**

<b>Aim</b>	<b>Business Take-up</b>	<b>Income Generation Potential</b>	<b>Fly Tipping Increase</b>	<b>Kerbside Collections</b>	<b>Maximise Staff Checks</b>	<b>Site Operations / Queues</b>	<b>Objections by Traders</b>	<b>Scope to Review and Increase Income Potential</b>
<b>Full Cost Recovery</b> (covers full cost of scheme + full disposal costs)	<b>Red</b>	<b>Red</b>	<b>Red</b>	<b>Red</b>	<b>Green</b>	<b>Green</b>	<b>Red</b>	<b>Red</b>
<b>Minimum Cost Recovery</b> (covers cost of scheme only and no contribution to disposal)	<b>Green</b>	<b>Amber/Green</b>	<b>Green</b>	<b>Green</b>	<b>Red</b>	<b>Red</b>	<b>Amber</b>	<b>Green</b>
<b>Equitable Cost Recovery</b> (covers cost of scheme and some contribution towards disposal)	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Amber / Green</b>	<b>Green</b>	<b>Amber / Green</b>	<b>Amber / Green</b>	<b>Green</b>

**Key:** **Green** = Low risk    **Amber** = Medium risk    **Red** = High risk

**Trade Permit – Payment Type Assessment**

**Appendix 4b**

<b>Aim</b>	<b>Suitability for Customer</b>	<b>Objections by Traders</b>	<b>Suitability for SBC Processes and Admin</b>	<b>Income Generation Potential</b>	<b>Payment Guaranteed for the Year</b>	<b>Guarantee of Payment Collection</b>	<b>CRC Staff Know Permit is Paid and Valid</b>	<b>Scope to Review and Increase Income Potential</b>
<b>One-off online payment by Credit/Debit Card</b>	<b>Green</b>	<b>Amber/Red</b>	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Amber</b>
<b>D/D Payment</b>	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Green</b>	<b>Red</b>	<b>Red</b>	<b>Red</b>	<b>Green</b>
<b>Cheque/Cash</b>	<b>Green</b>	<b>Green</b>	<b>Red</b>	<b>Green</b>	<b>Red</b>	<b>Red</b>	<b>Red</b>	<b>Red</b>

**Key: Green = Low risk Amber = Medium risk Red = High risk**

**Trade Permit - System Impact Assessment**

**Appendix 4c**

System Type	Convenience for Customer	Objections by Traders	Convenience for Checking by Operations	Payment Guaranteed for the Year	Suitability for SBC Processes and Admin	Queuing / Delays	Scope to Review and Increase Income Potential
Permit	Green	Green	Green	Green	Green	Green	Green
Vouchers	Amber	Amber	Red	Red	Red	Red	Green
Booking System	Amber/Red	Red	Red	Red	Red	Red	Green
Weighbridge and Pay	To be considered in future						

Key: **Green** = Low risk    **Amber** = Medium risk    **Red** = High risk

**Total no. surveys completed:** 95 (86 online; 9 hardcopy)  
**Already have kerbside recycling contract:** Yes: 62 No: 33

**Types of materials brought in** (most frequent first):

Paper, card, cans or plastics	59
Non-recyclable waste for landfill	40
Other (see below)	25
Garden Waste	24
Metal	24
General rubble/stones, etc.	23
Wood	23
Soil	6

**Other materials:**

Batteries, fluorescent tubes, small electrical appliances, lights, glass bottles, carpets, underlay, glass, printer ink cartridges, hard drives, computers, private household waste, surplus office furniture, WEEE, oil, insulation.

**Frequency of visits** (most often first):

Weekly	29
Monthly	21
Fortnightly	19
Twice per week	11
Other (see below)	9
Daily	4
Every second day	3

**Other times:**

None, once or twice a year, rarely, twice a week at most, very occasionally, weekly as required, as and when required, rarely in winter, more often in summer with garden waste, every 3-6 months, perhaps every other month.

**Times most likely to visit:**

Could be any time during the day	55
9am-noon	16
4pm-5pm	14
Pre 9am	10
2pm-4pm	9
Noon-2pm	4

**Type/Size of Vehicle Used:**

Transit van	32
Car	20
Small panel van	15
4x4	10
Estate car	7
Car based van	5
Pick-up/flatbed	5
Micro/mini van	2

**Likelihood of bringing in a trailer:**

**Yes: 15** **No: 79**

**Numbers aware they have a Duty of Care / have to register as a Waste Carrier:**

**Yes: 78** **No: 16**

**CRC most likely to be used:**

Galashiels	23
Hawick	23
Eshiels	16
Could be all/any site	13
Selkirk	10
Eyemouth	9
Duns	6

 <p>Vehicles exceeding 3.5 tonnes GVC</p>	 <p>Trailers over 6ft x 4ft</p>
 <p>Agricultural vehicles (tractors)</p>	 <p>Tippers or tail-lifts</p>
 <p>Motorhomes</p>	 <p>Horseboxes &amp; Horse trailers</p>

 <p><b>Cars</b></p>	 <p><b>e cars</b> <b>Estat</b></p>
 <p><b>4 x 4s</b></p>	 <p><b>Car derived vans</b></p>
 <p><b>Large and small panel vans</b></p>	 <p><b>Microvans and Minivans</b></p>
 <p><b>Trailers of 6ft x 4ft or less</b></p>	 <p><b>Transit vans not exceeding 3.5 tons GVW</b></p>



**Scottish Borders Council**  
**Stage 1 Equality Impact Assessment – Start Up**

(For Early Proposals, Project Initiation, Start Up)

1.	<b>Title of Proposal:</b>	Community Recycling Centre (CRCs) Review - Trade Access Policy
<i>(Please enter the title or reference for your proposal)</i>		
2.	<b>Service Area:</b> <b>Department:</b>	Place – Neighbourhood Services - Waste Services
<i>(Please enter the department/service area submitting the proposal)</i>		
3.	<b>Description:</b>	<p>To review Community Recycling Centre provision to ensure it is fit for purpose and financially sustainable in the long term.</p> <p>This has resulted in the need to consider permitting businesses access to the sites for the disposal of waste and recycling.</p> <p>Businesses currently have the option to contract with SBC for a kerbside waste / recycling collection service or can take materials directly over a weighbridge and then direct to landfill. The introduction of a permit system allowing businesses access to CRCs will:</p> <ul style="list-style-type: none"> <li>- improve the range of services SBC currently offers to businesses,</li> <li>- provide a more efficient and effective means for small, mobile businesses to dispose of their waste,</li> <li>- support businesses in meeting their legislative requirements under the Waste (Scotland) Regulations 2012 and also</li> <li>- allow SBC to recover some of the costs currently incurred through businesses' unauthorised access to CRCs.</li> </ul> <p>It should be noted that all businesses have a legislative duty to ensure their waste is treated and disposed of in an authorised manner by authorised, licenced waste disposal operators. Waste collection, treatment and disposal operators, of which the Council is on, can recover the costs of providing such services.</p>

4.	<b>Relevance to the Equality Duty.</b> <b>Do you believe your proposal has any relevance to the following duties of the Council under the Equality Act 2010?</b> (If you believe that your proposal may have some relevance – however small please indicate yes)	
	<b>Duty</b>	<b>Yes/No</b>
	<b>Elimination of discrimination (both direct &amp; indirect), victimisation and harassment.</b> <i>(Could your proposal discriminate? Or help eliminate discrimination?)</i>	No
	<b>Promotion of equality of opportunity?</b> <i>(Could your proposal help or hinder the Council with this)</i>	Yes
	<b>Foster good relations?</b> <i>(Could your proposal help or hinder the council s relationships with those who have equality characteristics?)</i>	No

5.	<b>Which groups of people may be impacted (both positively and negatively) if the proposal is advanced?</b> (Please x all that apply).				
	Equality Characteristic	Impact			Description <i>Where you have identified a potential impact, please detail what you perceive this to be. Where an equality characteristic is potentially negatively affected, please explain how and the extent to which they may be negatively affected. If you are unsure of the answer please state this and recommend further investigation.</i>
		No Impact	Possible Positive Impact	Possible Negative Impact	
<b>Age</b> (Older or younger people or a specific age grouping)	X			Implementation of this policy would have no impact on this group.	
<b>Disability</b> e.g. Effects on people with mental, physical, sensory impairment, learning disability, visible/invisible, progressive or recurring			X	Implementation of this policy would have a possible negative impact on a group that was unable to drive however SBC has a kerbside collection service that would meet such businesses needs and this policy is being developed to meet the needs of mobile, peripatetic businesses.	

<b>Gender</b> (Males, Females, Transgender or Transsexual people)	X			Implementation of this policy would have no impact on this group.
<b>Race Groups:</b> including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)	X			Implementation of this policy would have no impact on this group.
<b>People with Religious or other Beliefs:</b> different beliefs, customs (including atheists and those with no aligned belief)	X			Implementation of this policy would have no impact on this group.
<b>Sexual Orientation,</b> e.g. Lesbian, Gay, Bisexual, Heterosexual	X			Implementation of this policy would have no impact on this group.
<b>Carers</b> (those who have caring responsibilities for someone with an equality Characteristic)	X			Implementation of this policy would have no impact on this group.
<b>Poverty</b> (people who are on a low income including benefits claimants, people experiencing fuel poverty, isolated rural communities etc)		X	X	Some businesses, based and operating in a rural community and depending on where this community is located, could be negatively impacted due to the fact that SBC has a limited number of CRCs across the Borders and they therefore may have increased fuel costs. SBC however also has a kerbside collection service that the business could utilise.  On the other hand, some businesses could be positively impacted as disposing of waste and recycling at CRCs may provide an easier and more convenient means of disposing of their waste.

					The overall benefits of improving the range of services SBC can offer to businesses is considered to outweigh any likely negative impact that might be incurred to some in this group.
	<b>Employees</b> (those employed by the Council including full time, part time and temporary)		X	X	<p>Employees working at the Community Recycling Centres would be positively impacted if this policy and the resource identified to manage the system is approved as they will be more supported in their role in dealing with customers and being able to manage the new policy.</p> <p>If the policy is approved without the resource then staff will likely be negatively impacted as they will have very little support and little means to manage or enforce the new policy.</p>

6.	<b>Mitigation</b>	
	Where you have identified a potential negative impact, please detail what mitigations will need to be put in place in order for your proposal to progress. <b>If you are unsure of the answer please state this and recommend further investigation.</b>	
	<b>Characteristic</b>	<b>Mitigation</b>
	Disability	The existing kerbside collection service mitigates this potential negative impact.
	Poverty	Businesses have a duty of care and legislative requirement to ensure their waste is collected, treated and disposed of in an authorised manner. They will have to pay for such a service. SBC offers a range of services for businesses. This policy results in another means available to businesses to ensure they comply with their duties.
Employees	Ensure that additional resource, as requested, is put in place to help manage the CRC trade access policy if approved.	

7.	<b>How certain are you of the answers you have given?</b>	
	<b>Answer</b>	<b>Tick One</b>
	<b>Certain</b> - I have populated the evidence base to support my answers.	
	<b>Fairly Certain</b> – but don't have concrete evidence to support my answers so would recommend further assessment is conducted if the proposal is progressed.	✓
	<b>Not Certain</b> – further assessment is recommended if proposal is progressed.	

<b>Completed By</b>			
Name	Fiona McDougall	Service Area.	Waste Services
Post	Project Officer	Date	July 2015

**This assessment should be presented to those making a decision about the progression of your proposal. If it is agreed that your proposal will progress, you must send an electronic copy to corporate communications to publish on the webpage within 3 weeks of the decision.**

For your records, please keep a copy of this Equality Impact Assessment form.

**The rural proofing checklist**

Consider all the questions below. Will your initiative encounter the challenges presented by rural circumstances? Answering 'Yes' indicates a potential negative impact which should be highlighted and, where appropriate, adjustments should be made. Some potential solutions are indicated to help you consider appropriate adjustments. *Please refer to the guidance note 'Frequently Asked Questions' before completing the checklist.*

**Name of policy/ strategy: Integrated Waste Management Strategy – Community Recycling Trade Access Policy**

**Date checklist completed: 12 August 2015**

**Completed by: Fiona McDougall**

	<b>Yes</b>	<b>No</b>	<b>Summary of likely negative impacts:</b>
<p><b>1. Will the policy have a negative effect on the availability or delivery of services for people living in rural areas?</b></p> <p><i>For example, might it encourage closure or centralisation, and will this have an unequal/negative effect in rural areas where services are already limited?</i></p> <p><i>Rural solutions: improve transport/ accessibility to compensate for the centralisation of services; encourage other funds for threatened rural services; provide more money to rural outlets to maintain service standards.</i></p>	<b>X</b>		<p>Community Recycling Centres (CRCs) are currently only located in 7 towns across the Borders.</p> <p>Access for traders to dispose of their waste and recycling will be restricted to 6 sites: Galashiels, Hawick, Eshiels, Duns, Eyemouth and Kelso CRCs.</p> <p>Selkirk CRC will not be available to businesses as it is too small and has limited capacity. Traders working in the Selkirk area will therefore need to drive to another CRC.</p>

	Yes	No	<b>Summary of likely negative impacts:</b>
			<p><b>Summary of adjustments made:</b>            No adjustments are possible. Access to CRCs for traders is provided in addition to existing trade collection and weighbridge offload services.</p>

	Yes	No	Summary of likely negative impacts:
<p><b>2. Will access to the service be restricted for people living in rural areas? (If yes, how will the service be made available to people living in rural areas?)</b></p> <p><u>For example</u>, will the policy result in the need for increased travel, or have a negative impact on the ease and/ or cost of travel? Will the impact be different in sparsely populated or remote rural areas, where journey times tend to be longer, public transport is poor, more people rely on a car and travel options are limited or expensive?</p> <p><i>Rural solutions: reduce the need to travel by using mobile services, local delivery or telephone / internet; ease travel by coordinating or improving transport links (e.g. additional services, on-demand transport, community transport/ community car schemes, taxi vouchers); reduce the costs of travel by subsidising services or individuals (remembering that there may be no public transport service between many locations; share premises or staff with other service providers to maintain or create a rural outlet ('joint provision').</i></p>	X		<p>Community Recycling Centres (CRCs) are currently only located in 7 towns across the Borders.</p> <p>Access for traders to dispose of their waste and recycling will be restricted to 6 sites: Galashiels, Hawick, Eshiels, Duns, Eyemouth and Kelso CRCs.</p> <p>Selkirk CRC will not be available to businesses as it is too small and has limited capacity. Traders working in the Selkirk area will therefore need to drive to another CRC.</p> <p>Allowing trade access to the CRCs is however likely to be more beneficial, especially to peripatetic businesses, than the existing kerbside trade collection services on offer.</p> <p><b>Summary of adjustments made:</b> No adjustments are possible. Access to CRCs for traders is provided in addition to existing trade collection and weighbridge offload services.</p>



	Yes	No	Summary of likely negative impacts:
<p><b>3. Will the cost of delivery be higher in rural areas (where customers are more widely dispersed or it is hard to be cost-effective)? (If yes, how will this extra cost be met or lessened?)</b></p> <p><i>For example, will longer travel times or distances to clients add to the cost of service provision? Will services need to be run out of smaller outlets, reducing cost-effectiveness?</i></p> <p><i>Rural solutions: allow for higher unit delivery costs when calculating costs (e.g. a 'sparsity' factor) or when specifying cost-efficiency criteria; encourage joint provision to reduce costs.</i></p>		X	<p>The cost of delivery will not be greater in rural rather than urban areas as the permit charges are fixed according to material type and not based on geographical location.</p>
			<p><b>Summary of adjustments made:</b> N/A</p>
<p><b>4. Will the policy have a negative effect on the availability of affordable housing in rural areas?</b></p> <p><i>For example, have all the knock-on consequences been considered which might affect or reduce the number of houses available or make it more difficult for people to find a housing solution in rural areas?</i></p> <p><i>Rural solutions: consider provision of alternative affordable rural housing solutions.</i></p>		X	<p><b>Summary of likely negative impacts:</b> N/A</p>
			<p><b>Summary of adjustments made:</b> N/A</p>

	Yes	No	Summary of likely negative impacts:
<p><b>5. Will the policy be delivered by the private sector, or through a public-private partnership or local institution that may limit provision in rural areas?</b></p> <p>For example, will the smaller, scattered population in rural areas provide a sufficient market to attract the private sector? Will there be similar opportunities for choice and competition? Does the private sector in rural areas have the capacity to deliver? Will the policy be as effective in rural areas, where private, public and voluntary sector organisations tend to be smaller and have less capacity? If funds or services are to be allocated via a bidding process, will small organisations be able to compete fairly?</p> <p><i>Rural solutions: consider the use of regulation, including universal service obligations; set rural delivery targets; draw up contracts that prevent cherry picking of the most profitable (urban) markets; encourage commercial providers with incentives; offset higher rural costs (e.g. through rate relief); provide specific support for capacity building; allow longer timescales for bidding; simplify the bidding process; allow an increased level of public or voluntary sector input to compensate for limited private sector input.</i></p>		<p><b>No</b> <b>X</b></p>	<p><b>Summary of likely negative impacts:</b> <b>N/A</b></p> <hr/> <p><b>Summary of adjustments made:</b> <b>N/A</b></p>

	Yes	No	
<p><b>6. Does the policy rely on infrastructure for delivery (e.g. mobile phone coverage, broadband ICT, main roads, utilities) that may be limited in rural areas?</b></p> <p>For example, how will the policy work in rural areas where the existing infrastructure is typically less developed (e.g. no mobile phone coverage), or where infrastructure does not exist (e.g. cable TV, mains gas), and / or where upgrading of infrastructure may be difficult or expensive?</p> <p><i>Rural solutions: consider using regulation or licences to encourage the development of better infrastructure; encourage or coordinate demand to make supply viable; use the public sector's collective demand to stimulate supply; provide other ways of accessing the service. Use local radio and existing local communication networks to disseminate information.</i></p>		<p><b>X</b></p>	<p><b>Summary of likely negative impacts:</b> The trade permit system relies on access to CRCs, site infrastructure that already exists.</p> <hr/> <p><b>Summary of adjustments made:</b> <b>N/A</b></p>

	Yes	No	
<p><b>7. Will the policy have a negative impact on rural businesses, or land-based businesses, (including the self-employed) and therefore, on rural economies and environments?</b></p> <p><i>For example, will it have a different effect on smaller businesses (which employ a larger part of the workforce in rural areas) or those sectors which are typically more important in rural areas – farming, forestry, tourism? Will the higher proportion of self-employed people in rural areas be affected (including those running part-time businesses)?</i></p> <p><i>Rural solutions: ensure the needs of small businesses are specifically addressed; take support, advice and training out to businesses; where possible avoid too much red tape that will unduly affect small firms. Consider opportunities for innovative local service delivery mechanisms which may also boost local employment and income; identify 'win-win' solutions which deliver economic, social and environmental benefits (e.g. identify local delivery solutions; consider incentives for environmentally friendly practices; promote local supply chains; allow for and encourage a wide range of rural enterprises).</i></p>		<p><b>No</b> <b>X</b></p>	<p><b>Summary of likely negative impacts:</b> There is likely to be a positive impact on rural businesses which will be allowed admittance to CRCs in the area for the first time and use those closest to their customers.</p> <hr/> <p><b>Summary of adjustments made:</b> <b>N/A</b></p>

	Yes	No	Summary of likely negative impacts:
<p><b>8. Will the policy have a negative impact on employment in rural areas?</b></p> <p><u>For example</u>, will any full or part-time posts be lost as a result? Will the existing jobs become less attractive and therefore harder to fill in a rural location? What will be the impact on other services provided in the area?</p> <p><i>Rural solutions: consider if part-time jobs can be 'rolled up' to create a more sustainable post; look for a local delivery solution; consider measures to improve the choice of work (e.g. increasing skills, improving local childcare, improving transport to work).</i></p>		<p><b>X</b></p>	<p><b>Summary of likely negative impacts:</b> N/A</p> <hr/> <p><b>Summary of adjustments made:</b> N/A</p>

	Yes	No	Summary of likely negative impacts:
<p><b>9. Will the policy have a negative impact on people who are disadvantaged in rural areas? (If the policy is targeted at addressing disadvantage, how will it target rural disadvantage, which is not usually concentrated in neighbourhoods?)</b></p> <p><u>For example</u>, do the indicators used for identifying need measure rural deprivation issues (e.g. access to services, access to job opportunities, low earnings and housing affordability)?</p> <p><i>Rural solutions: use small area statistics to identify pockets of hardship; adjust the indicators or their weighting to accommodate both urban and rural aspects of deprivation; choose larger areas for targeting to pick up scattered disadvantage; target population groups rather than areas.</i></p>		<p><b>X</b></p>	<p><b>N/A</b></p> <hr/> <p><b>Summary of adjustments made:</b></p> <p><b>N/A</b></p>

	Yes	No	Summary of likely negative impacts:
<p><b>10. Does the policy assume 'one size fits all', and fail to take into account the different size and specific circumstances of smaller rural schools and other isolated rural service facilities?</b></p> <p><i>For example, would centralisation of a service reduce local purchasing and job opportunities in the rural area, or create increase travel time and energy costs?</i></p> <p><i>Rural solutions: consider the possibility of creating localised and alternative solutions in rural areas.</i></p>		X	<p>The policy is based on a chargeable two permit system: (1) Recycling permit and (2) Green, Construction &amp; Recycling permit which allows disposal of different materials at different charges according to the business's needs.</p>
			<p><b>Summary of adjustments made:</b> N/A</p>

### Steps to take

1. Ensure you are clear about the objectives of the proposed policy, its intended impacts or outcomes (including which areas, groups or organisations should benefit) and the means of delivery.
2. Run through each question in the checklist, identifying where the proposed policy is likely to have a different impact in rural areas, focusing on potential negative impacts.
3. Where there is uncertainty or a potentially different (worse) impact, this should be investigated further (and included in the overall assessment of the costs and benefits of the policy).
4. Where the impact in rural areas will be significantly different, explore policy options to produce the desired outcomes in rural areas or avoid/ reduce any undesirable impacts. This exercise may also highlight opportunities to maximise positive impacts in rural areas.

Feed the results of your appraisal, including solutions, into the decision-making process and ensure a record is kept, to be included in your Department's annual proofing report.