
WASTE UPHOLSTERED DOMESTIC SEATING

Report by Director of Infrastructure & Environment

SCOTTISH BORDERS COUNCIL

28 March 2024

1 PURPOSE AND SUMMARY

- 1.1 **This report outlines the impact of new guidance on Waste Upholstered Domestic Seating (WUDS) containing Persistent Organic Pollutants (POPs) and recommends amendments to the Waste Services provided by the Council in to ensure compliance.**
- 1.2 The Scottish Environmental Protection Agency (SEPA) issued new guidance on the 31st October 2024, which banned waste upholstered domestic seating (WUDs) containing persistent organic pollutants (POPs) from being sent to landfill.
- 1.3 Examples of Waste Upholstered Seating (WUDS) include sofas, sofa beds, armchairs, kitchen & dining room chairs, stools & foot stools, home office chairs, futons, bean bags and cushions.
- 1.4 The Council's current approach to managing WUDs containing POPs is not compliant with the new guidance. This is due to the mixing of WUDS containing POPs with uncontaminated material.
- 1.5 In order to become compliant with the new Guidance the Council will need to stop accepting, collecting, storing, transporting, and treating WUDS containing POPs as part of the mixed bulky waste stream.
- 1.6 This will require multiple changes to the Council's operations. It will also impact how the Council receives and collects WUDS containing POPs from Households and Businesses via the following channels:
 - Bulky Uplift Service
 - Community Recycling Centres
 - Waste Transfer Stations; and
 - Uplift of fly tipped waste.

2 RECOMMENDATIONS

2.1 I recommend that Scottish Borders Council:

- (a) Notes the requirements of the new guidance.**
- (b) Notes that the Council is not compliant with the new guidance.**
- (c) Notes the need to amend its operations to become compliant.**
- (d) Notes the financial implications.**
- (e) Approves the recommendations as outlined in Section 10.**
- (f) Approves the next steps as outlined in Section 11.**

3 BACKGROUND

3.1 Persistent Organic Pollutants (POPs) – a group of hazardous chemicals which have harmful impacts on the environment and human health - have recently been found in articles of upholstered domestic seating in quantities which exceed legal limits.

3.2 This means that once these items of upholstered domestic seating become waste – known as Waste Upholstered Domestic Seating (WUDS) – they become subject to the strict controls outlined in the **UK Persistent Organic Pollutants Regulations 2007** and its subsequent amendments.

3.3 Examples of Waste Upholstered Seating (WUDS) include:

- Sofas
- Sofa beds
- Armchairs
- Kitchen and dining room chairs
- Stools and foot stools
- Home office chairs
- Futons, bean bags and, floor and sofa cushions

This list includes any part made of or containing leather, synthetic leather, other fabric, or foam.

3.4 The Scottish Environment Protection Agency issued [guidance](#) regarding the management of WUDS containing POPs on the 31st October 2023, see **Appendix A**. Importantly this new guidance is underpinned by the UK Persistent Organic Pollutants Regulations 2007 and must be adhered to.

3.5 The following details some of the key elements of the guidance:

- We must assume all WUDS contain POPs unless we can prove otherwise via laboratory testing and/or an XRF scanner.
- WUDS containing POPs must not be landfilled.
- WUDS containing POPs must be collected, stored and transported separately from all other waste.
- If other waste is cross contaminated with WUDS containing POPs it must be sent for destruction.
- Destruction means destroyed or irreversibly transformed for example incineration.
- WUDS can be shredded but this must be within a building which will require air handling, bag filters and a drainage system which controls the release of POPs.

This is not an exhaustive list.

4 HOW DOES THE COUNCIL CURRENTLY MANAGE WUDS CONTAINING POPS?

4.1 The Council collects and receives WUDS containing POPs from Households and Businesses via the following channels:

- Bulky Uplift Service
- Community Recycling Centres
- Waste Transfer Stations; and
- Uplift of fly tipped waste.

4.2 In the main **WUDS are currently collected, received and stored as part of a mixed waste stream with non-POPs contaminated material**. This mixed waste stream is subsequently sent to Levensat under our Bulky Waste Contract where the material is pre-treated to extract recyclable materials (e.g. metals, wood, glass etc). Most of the remaining material is sent to Energy from Waste (EfW) and remainder goes to landfill as fines.

In 2023 around 48% of the Bulky Waste was recycled by Levensat, helping the Council to achieve household recycling rate of around 58%.

5 IS THE COUNCIL COMPLIANT?

5.1 The **Council's current approach to managing WUDs containing POPs is not compliant with the new guidance**. This is due to the mixing of WUDS containing POPs with uncontaminated material. It is important to recognise that the Council is not alone in this regard due to:

- a) National uncertainty around the guidance, which was not finalised until 31st October 2023.
- b) National uncertainty as to what steps needed to be taken to become compliant.
- c) The financial and operational risks of investing in a solution that may turn out to be non-compliant.
- d) National lack of off-takers capable of treating WUDs containing POPs.

5.2 It is worth noting that SEPA wrote to all Chief Executives Officers on the 17th October 2023 (**Appendix B**) confirming that:

- a) The final guidance would be issued on the 31st October 2023.
- b) It is necessary for Scottish local authorities to comply with the landfill ban without delay, however **SEPA will not take enforcement action in respect of any failure to do so before 31 January 2024**.
- c) Although SEPA appreciate the difficulty of financing unexpected service costs such as this, POPs are a serious environmental hazard and not a pollutant that can be taken lightly.

6 STEPS TAKEN SO FAR

6.1 A Briefing Note was issued to Members in September 2023 (**Appendix C**) to raise awareness of the impending guidance and the impact it may have on how households, business and the Council manage and dispose of Waste Upholstered Domestic Seats (WUDS).

- 6.2 The topic has been discussed with our treatment provider (Levenseat Ltd) at monthly contract meetings. Levenseat have continued to accept WUDs contaminated with POPs as part of our Bulky Waste Stream.
- 6.3 The Council has run trials at its Community Recycling Centres and Waste Transfer Stations to determine how best to separately accept, bulk, load, transport and treat WUDs contaminated with POPs.
- 6.4 Officers have kept up to date with the emerging situation through the Scottish Waste Manager Officer Network and COSLA. This has included numerous meetings with SEPA and representatives from the Scottish Government.

7 COSLA – FINANCIAL COMPENSATION UPDATE

- 7.1 COSLA are liaising with SEPA, Scottish Government, Local Authorities, Waste Manager Officer Network chairs, SOLACE and the commercial sector regarding WUDs compliance.
- 7.2 COSLA are in discussion with the Scottish Government regarding financial compensation for Local Authorities. At the current time COSLA are waiting on the outcome of a business case submitted to DEFRA regarding the costs of complying with the new guidance. COSLA and the Scottish Governments expectation is that a proportional amount of funding should be passed to Scottish Local Authorities based on the outcome of the DEFRA decision, however this is not yet confirmed.
- 7.3 In addition COSLA is investigating if existing funding streams such as the Scottish Recycling Improvement Fund can be used to cover WUDs compliance costs. Thus far this has not proven successful.
- 7.4 The Leader of Scottish Borders Council wrote to COSLA in March, outlining the importance of full financial compensation for compliance with the new WUDs guidance. This is particularly important given the unprecedented financial challenges the Council is facing and is keen to ensure key frontline services are not detrimentally impacted.

8 WASTE TREATMENT CONTRACT UPDATE

- 8.1 On the 6th February the Council received a letter from Levenseat (**Appendix D**) confirming that they had received permission from SEPA to separate WUD's from mixed loads for processing without the need to reject the full load. It went onto explain that this would come at an additional cost i.e., a minimum charge of £100 per load for up to 5 items of WUD's and £20 per item thereafter.
- 8.2 **This arrangement is only available until** Levenseat's new WUDS treatment facility becomes operational in **early April 2024**. From this point they have requested that the Council send WUDs contaminated with POPs separately from other waste.
- 8.3 Levenseat have indicated that they will not consider WUDs containing POPs to be Bulky Waste under the terms of our current contract. They have also suggested that the treatment fee for WUDs containing POPs will increase by around £81/t.

- 8.4 The Council managed around 8,100 tonnes of bulky waste in 2023, however not all of this will be WUDS containing POPs. Without knowing the waste composition, it is difficult to calculate the impact of the additional treatment costs proposed by Levenseat. However, we estimate that the **additional treatment cost is most likely to range from £65k per annum (at 10% WUDS) to £458k per annum (at 70% WUDS).**
- 8.5 **Officers best guess is that WUDS containing POPs is likely to make up around 30% of the Council's current Bulky Waste Stream, which would mean an additional treatment cost of around £196k per annum.** It is important to remember this is purely the additional treatment and haulage cost, it does not take account of the internal operational costs e.g. provision and servicing skips at Community Recycling Centres.
- 8.6 The Contractual position with Levenseat in relation to treatment and haulage costs are far from certain at this time. For clarity Legal services have advised that the new guidance from SEPA constitutes a Change in Law under the terms of our Bulky Waste Contract with Levenseat. Officers have therefore written to Levenseat requesting written notice of necessary changes, estimated changes in cost, capex etc that are related to the change in law. This will lead to discussions about ways to mitigate the effects of the Change. As part of this dialogue Levenseat will be required to provide evidence that they have used all reasonable endeavours to minimise cost increases and comparative evidence of how the change has affected prices by similar businesses.

9 WHAT DOES THIS MEAN FOR THE COUNCIL?

- 9.1 In order to become compliant with the new Guidance the Council will need to stop accepting, collecting, storing, transporting, and treating WUDS containing POPs as part of the mixed bulky waste stream.
- 9.2 This will require multiple changes to the Council's operations. It will also impact how the Council receives and collects WUDS containing POPs from Households and Businesses via the following channels:
- Bulky Uplift Service
 - Community Recycling Centres
 - Waste Transfer Stations; and
 - Uplift of fly tipped waste.
- 9.3 It worth noting that in the future WUDS containing POPs cannot be pre-treated and therefore **the Council is likely to experience a reduction in its overall recycling performance from around 58% to 55.7%** (2.3% reduction equivalent to around 1,200 tonnes per annum). However other Councils are likely to impacted in a similar way assuming they also pre-treat their bulky waste to extract recyclable material.

10 RECOMENDED WAY FORWARD

- 10.1 This section outlines the recommended way forward to ensure the Council's operations align with the UK Persistent Organic Pollutants Regulations 2007 and the new guidance.

10.2 In developing the proposals Officers have had to balance the following competing issues:

- The Council's legal requirements
- The needs of householders, businesses, and traders
- The operational restrictions i.e., site location, sizes, haulage etc....
- The financial implications

10.3 **BULKY WASTE SERVICE**

10.3.1 At the current time WUDS and Non WUDS items are collected on the same vehicle at the same time, which is not compliant.

10.3.2 It is proposed that the Council continues to collect WUDS containing POPs on the same vehicle at the same time but with the following additional measures:

- a. Temporary repairs must be made to any damaged WUDS to minimise the potential release of POPs.
- b. It is the responsibility of the waste producer (e.g., household or business) to repair the WUDS prior to uplift.
- c. The Council will refuse to uplift WUDS which are damaged and or have not been suitably repaired.
- d. The Council will wrap WUDS with a disposable plastic material to ensure other items on the bulky waste vehicle are not contaminated.

10.3.3 The following changes are proposed to the Bulky Uplift Fees and Charges:

- **Households** – Initially no change but to be kept under review.
- **Businesses** – WUDS to be charged an additional £20 per item effectively passing on Levenseat Ltd's treatment costs.

10.4 **COMMUNITY RECYCLING CENTRES**

10.4.1 At the current time WUDS and non WUDS are received and stored in the same skips/bays at Community Recycling Centres, which is not compliant.

10.4.2 It is important to recognise that the options available to the Council are significantly restricted by the following factors:

- a. **Limited space for additional skips** at Community Recycling Centres
- b. **Limited haulage capacity** - Specialist haulage vehicles are required to service/empty skips and we are already operating at near capacity.
- c. **Limited bulk storage capacity** - Only Easter Langlee Waste Transfer Station has capacity to accept WUDS separately.
- d. **Requirement to load WUDS containing POPs with air handling and dust suppression** – Only available at new Easter Langlee Waste Transfer Station.

10.4.3 In addition to the operational challenges outlined above the following have been a key consideration for service users:

- Ideally ensure all households have **local access to CRC's dispose of WUDS containing POPs**. This will minimise cost of disposal for residents and minimises the likelihood of fly tipping.
- Ideally ensure **CRC's have capacity to accept WUDS** when householders arrive with items so that residents are not turned away/disappointed.
- Ideally **ensure traders continue to have a disposal outlet in the Borders** but without impacting on our statutory duties to provide disposal facilities to householders.

10.4.4 Having undertaken various trials it is proposed that the following approach is taken at CRC's:

- An additional skip will be provided for acceptance of WUDS at all sites.
- WUDS will only be accepted from households.
- WUDS will not be accepted from Traders under the trade access permit scheme.
- WUDS from Traders will only be accepted at Easter Langlee Waste Transfer Station and will need to go over the weighbridge.
- Households will need to pre-book WUDS before coming to all CRC's except for Galashiels.
- WUDS that has not been pre booked in will not be accepted.
- Galashiels CRC will accept WUDS from households without the need to pre-book. This will be kept under review and may need to be withdrawn depending on volumes received.
- Temporary repairs must be made to any damaged WUDS prior to delivery to site to minimise the potential release of POPs.
- It is the responsibility of the waste producer (e.g., household) to repair the WUDS prior to delivery.
- The Council will refuse to accept WUDS which are damaged and or have not been suitably repaired.

10.4.5 Table 1 outlines the approach to WUDS at each Community Recycling Centre from the perspective of the service user.

Table 1 – Approach to WUDS Acceptance at CRC's

Site / CRC	Household WUDS accepted	Trade WUDS accepted	Maximum Number of WUDS items accepted per week (1 item = 1 single seat chair)*	Booking Required	Do damaged WUDS need a temporary repair prior to disposal at a CRC?
Galashiels	Yes	No	Unlimited	No	Yes
Hawick	Yes	No	15	Yes	Yes
Kelso	Yes	No	30	Yes	Yes
Selkirk	Yes	No	30	Yes	Yes
Eshiels	Yes	No	15	Yes	Yes
Duns	Yes	No	15	Yes	Yes
Eyemouth	Yes	No	15	Yes	Yes

***Note** – Maximum number of WUDS items

Each item is equivalent to 1 single seat, for example:

- 1 item = 1 single seat chair
- 2 items = x2 single seat chairs or a 2 seat sofa
- 3 items = x1 single seat chairs and a 2 seat sofa or a 3 seat sofa
- 4 items = x4 single seat chairs, or x2 2 seat sofas, or a 4 seat sofa

- 10.4.6 Waste Services is working with Council's Digital Innovations and System Team to develop the **WUDS booking system**. One of the key aims is to ensure it is integrated with the existing CRC vans and trailer booking system to make it as easy to use as possible for the service user.
- 10.4.7 It is recognised that the booking system for household is unlikely to be well received. However, it ensures that when residents arrive at a CRC there is space in the skip to offload the waste. If we do not provide a booking system this could not be guaranteed, and we may have to turn residents away. This would result in disappointed customers, complaints and flash points with staff. The alternative is not accepting WUDS at CRC's and asking residents to bring it to a central point, most likely Easter Langlee, which will be even less well received. This stance has been taken by other LA's e.g. Highland and [Renfrewshire](#).

10.5 WASTE TRANSFER STATIONS

- 10.5.1 At the current time WUDS and non WUDS are received and stored in the same bay (bulky waste bay) at each of the Council's Waste Transfer Stations, which is not compliant.
- 10.5.2 It is important to recognise that the options available to the Council are restricted by the following factors:
- **Limited space** within our Waste Transfer Stations. This is particularly acute at our older smaller sites (Hawick, Eshiels, Galashiels) which we are already operating at near capacity.
 - **Lack of suitable dust suppression and air handling** at all sites bar the new Easter Langlee Waste Transfer Station.
- 10.5.3 Having considered the requirements of the guidance only the new Easter Langlee Waste Transfer Station is capable of receiving and storing WUDS containing POPs separately.
- 10.5.4 Waste Services have subsequently identified a bay within the new Easter Langlee Waste Transfer Station for the separate storage of WUDS containing POPs. All WUDS from the following channels will be directed to this bay:
- Community Recycling Centres
 - Bulky Uplift Service
 - Fly tipping
 - Traders / businesses
- 10.5.5 **Traders and businesses will be directed to go over the weighbridge at Easter Langlee, which will the Council to**

charge by weight. Traders will need to transport and deliver WUDS containing POPs separately in accordance with the guidance. The Council will not be able to accept mixed loads of WUDS and non WUDS – SEPA have requested they are informed of repeat non-compliance.

10.5.6 The Council will need to recover its costs for the handling, haulage and treatment of WUDS disposed by third parties / traders. At this stage we do not have finalised costs due to the ongoing discussions with Levenseat Ltd. However, **we propose charging third parties £255 per tonne** based on current feedback from Levenseat and will review this once clarified.

10.6 Fly Tipping

10.6.1 At the current time the Council's Parks & Environment Service dispose of fly tipped waste as part of mixed loads at CRC's and Waste Transfer Stations across the Borders. This maximises the efficiency of their operation and minimises travel time. However, this will no longer be possible.

10.6.2 In future it is proposed that the Parks & Environment Team arrange for fly tipped WUDS to be uplifted as of the Council's bulky uplift service. Ensuring the items are wrapped in disposable plastic material and temporary repairs are made prior to uplift to ensure other items on the bulky waste vehicle are not contaminated.

10.6.3 Discussions are ongoing with the Parks & Environment Team to minimise the impact of the changes on their operations.

11 NEXT STEPS

11.1 Doing nothing is not an option for two key reasons:

- a. SEPA are likely take enforcement action.
- b. The Council will incur additional treatment costs, potentially in excess of £650k per annum if all bulky waste is treated as POPs contaminated.
- c. The Council's recycling performance will be worse off i.e., it would reduce from around 58% to 50.5% rather than to 55.7%.

The Council must therefore move quickly to implement the proposed changes outlined in section 10.

11.2 Given the recent correspondence from Levenseat (**Appendix D**) it is **recommended the new arrangements are introduced without delay.** Failure to do so could result in one of two things:

1. **Levenseat may stop accepting our bulky waste** – this would require us to stop accepting and collecting WUDS.
2. **Levenseat will treat all Bulky Waste as POPs contaminated** – this would increase our costs by circa £81/t and would significantly impact our recycling performance.

11.3 The operational changes required to implement the new arrangements are well developed due to the trials we have undertaken. However, it will not be

without its complications and will require an agile approach to make required adjustments.

11.4 The Council needs to inform households, businesses, and traders as soon as possible so that they can adjust to the new arrangements/requirements. This will require a communications plan to be delivered covering:

- a) **Letters to CRC trade waste permit** holders explaining that:
 - i) WUDS will no longer be accepted at CRC's.
 - ii) WUDS will need to be taken to Easter Langlee Waste Transfer Station and will be charged at a rate of £255 per tonne.
- b) **Letters to Waste Transfer Station Customers** explaining the new requirements and disposal costs.
- c) **Website information/guidance** updated for householders and businesses.
- d) **Social media** posts sign posting to the website.
- e) **Members Updates**
- f) **New signage at the Community Recycling Centres**

11.5 The proposed changes will result in negative feedback from service users and will be seen as a service reduction with increased bureaucracy, particularly in relation to:

- The booking system for households
- Only accepting WUDS from traders at Easter Langlee Waste Transfer Station.

11.6 A key element of the communications campaign will be stressing that the Council is responding to a new regulatory requirement.

11.7 Further dialogue is required with Levenseat Ltd to clarify the contractual position. This will be undertaken with the support of Legal Services and Procurement.

11.8 Officers will continue to liaise with finance to ensure the costs are fully understood and reflected in the budget monitoring and future financial planning.

12 IMPLICATIONS

12.1 Financial

- (a) **Treatment Costs** - The Council spent approximately £1.2 million on the haulage and treatment of mixed bulky waste in 2023 (calendar year). Initial analysis suggests that these costs are likely to increase by approximately £196k to around £1.4 million per annum, see section 8. However, we cannot be certain of the additional costs until the contractual discussions with Levenseat are concluded, and details of waste composition are available. It is recommended this is monitored and reported through the quarterly revenue reporting during 2024/25.
- (b) **Internal Operations Costs** - The cost of servicing and hauling skips to and from Community Recycling Centres is expected to increase for the following reasons:

- Increased number of haulage movements due to reduced density of loads
- Unable to accept WUDS separately at Hawick Waste Transfer Station, requiring additional haulage to Easter Langlee Waste Transfer Station.
- Current haulage fleet operating at near capacity and may need to be increased or supported.
- Increased skip maintenance and replacement costs.

Until we have run the new service, we cannot be certain of the additional CRC skip servicing costs, but we estimate them to be between £20k and £25k per year, see breakdown below:

Item	Approximate Annual Revenue Cost
Fuel	£4,200
Vehicle Maintenance	£8,800
Skip Depreciation	£7,000
Skip Maintenance	£1,000
Total	£21,000

This is on the assumption the service can be delivered within the current fleet and staff resource. If an additional hook lift vehicle and driver are required, this would incur an additional revenue cost of around £60k per annum.

- (c) **Potential additional costs** - There is a risk that the recommended approach does not work as planned or estimated treatment costs are exceeded. If this is the case further additional changes may be required, for example:

- Alterations to Community Recycling Centre & Waste Transfer Stations e.g., site expansion or layout change.
- Additional internal haulage vehicle required.

The delivery and costs will be monitored and where required further reports will be brought forward for consideration through the Council's committee process.

- (d) **Financial Compensation** – COSLA are seeking compensation from the Scottish Government to cover costs incurred by Local Authorities complying with the new guidance. However, currently we are awaiting confirmation, see section 7.

12.2 Risk and Mitigations

An assessment of the risks and mitigations of implementing and not implementing the recommendations of this report has been undertaken. Please see **Appendix E** for full details.

12.3 Integrated Impact Assessment

A Stage 1 - Scoping and Assessing for Relevance has been undertaken, see, **Appendix F**. The assessment indicates that the proposals are being put forward to comply with new guidance issued by SEPA and concludes that a full impact assessment is not deemed necessary. However, this position may change depending on ongoing monitoring. It also confirmed that the Council has attempted to minimise the impacts whilst balancing the following competing issues/demands:

- The Council’s legal requirements
- The needs of householders, businesses, and traders
- The operational restrictions i.e., site location, sizes, haulage etc....
- The financial implications

12.4 Sustainable Development Goals

The table below outlines the UN Sustainable Development Goals that are affected by the proposals and summarises the impacts:

UN SD Goal	Impact
3 - Ensure healthy lives and promote wellbeing for all at all ages	Compliance with the new guidance will help minimise the health impacts of Persistent Organic Pollutants released from WUDS.
14 - Conserve and sustainably use the oceans, seas and marine resources for sustainable development	Compliance with the new guidance will help minimise the impact of Persistent Organic Pollutants on oceans, seas and marine resources.
15 - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss	Compliance with the new guidance will help protect terrestrial ecosystems from the impact of Persistent Organic Pollutants.

12.5 Climate Change

The proposals have been assessed against the criteria in the Council’s Climate Change Checklist identifying the following mitigations and enhancements:

- Existing waste infrastructure (e.g., CRC’s and Waste Transfer Stations) is being used as efficiently as possible to support compliance with the new WUDS containing POPs guidance.
- The proposals ensure that we maximise the amount of waste that is recycled and minimises the amount sent for Energy from Waste (EfW) and or landfill.
- Where possible we have attempted to reduce road movements through the bulking of waste at Waste Transfer Stations.
- The proposal ensures households can dispose of WUDS containing POPs at their local Community Recycling Centre via a booking system.

- The proposal ensures businesses can continue to dispose of WUDS containing POPs within the Scottish Borders. However, the size and capacity of our waste facilities means they will no longer be able to access CRC's for this waste type.

12.6 Rural Proofing

A rural proofing assessment has been undertaken, for further information please see **Appendix G**.

12.7 Data Protection Impact Statement

It is anticipated that the proposals in this report will have a minimal impact on data subjects and the Information Manager has confirmed that a Data Protection Impact Assessment is not required. However, we still need to comply with the Data Protection principles for example ensuring that residents understand how the council will collect and use their information collected via the new booking system.

12.8 Changes to Scheme of Administration or Scheme of Delegation

No changes to the Scheme of Administration or the Scheme of Delegation as a result of the proposals in this report.

13 CONSULTATION

12.1 The Chief Executive, the Director (Finance & Procurement), the Director (Corporate Governance), the Chief Officer Audit and Risk, the Director (People Performance & Change), the Procurement Officer, and Corporate Communications have been consulted and comments have been incorporated into the final report.

Approved by

Name John Curry

Title Director of Infrastructure & Environment

Author(s)

Name	Designation and Contact Number
Ross Sharp-Dent	Waste & Passenger Transport Manager

Background Papers: NA

Previous Minute Reference: NA

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

Contact us at RSharp-Dent@scotborders.gov.uk

Appendix A – Guidance on the management of Waste Upholstered Domestic Seating (WUDS) containing Persistent Organic Pollutants (POPs) October 2023



231026_POpsWUDS
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APPENDIX B – Letter from SEPA to the CEO – 17th October 2024



POPS Email Letter
from SEPA CEO.pdf

APPENDIX C – Members Briefing Note – September 2023



September 2023 -
WUDS Update.pdf

APPENDIX D – Letter from Levensat Ltd – 6th February 2024



POPs Letter -
SBC.pdf

APPENDIX E - RISKS

Risks associated with NOT delivering the Recommendations

Risk	Mitigation
Regulator enforcement action including potential fines.	Implement proposed service changes.
Negative press coverage related to enforcement action.	Implement proposed service changes.
Increased environmental and health impacts associated with current waste management arrangements.	Implement proposed service changes.
Levenseat refuses to accept mixed bulky waste, which ultimately means we will have to cease accepting bulky waste from households and businesses.	Implement proposed service changes.
Levenseat accepts all mixed bulky waste containing WUDS but treats it all as contaminated with POPs. This will be charged at an increased rate (circa £690k per annum) and will reduce recycling performance.	Implement proposed service changes.

Risks associated with delivering the Recommendations

Note - The proposed changes to service provision are being made to comply with new legal requirements.

Risk	Mitigation
Negative feedback from householders and businesses.	<p>Communications campaign to be delivered outlining reasons for the change and the new arrangements.</p> <p>The new arrangements ensure households can continue to dispose of WUDS at their local CRC free of charge. Pre booking is required at all sites bar Galashiels. Bookings can be made online and by phone.</p> <p>Households and businesses can continue to pay for a bulky waste uplift of WUDS.</p> <p>Traders can dispose of WUDS directly at Easter Langlee Waste Transfer Station.</p> <p>SBC will monitor the new arrangements and adjust where practicable/affordable.</p>

<p>Increase in fly tipping</p>	<p>As above. SBC will monitor report of fly tipping and adjust the arrangements where practicable/affordable.</p>
<p>The revenue and capital costs exceed current estimates.</p>	<p>Costs will be reviewed as part of regular financial monitoring/forecasting. Operational adjustments will be made where practicable/affordable to minimise costs. Where required further reports will be brought through the committee process for consideration.</p>
<p>Proposed service can not be delivered within existing resource as currently envisaged.</p>	<p>SBC will monitor the new arrangements and adjust where practicable/affordable. Where required further reports will be brought through the committee process for consideration.</p>
<p>The regulator (SEPA) requires further changes to ensure compliance.</p>	<p>SBC will monitor the new arrangements and adjust where practicable/affordable. Continue to engage with the regulator and the Waste Mangers Network. Where required further reports will be brought through the committee process for consideration.</p>

Integrated Impact Assessment (IIA)

Stage 1 Scoping and Assessing for Relevance

Section 1 Details of the Proposal

A. Title of Proposal:	Waste Upholstered Domestic Seating (WUDS) containing Persistent Organic Pollutants (POPs)
B. What is it?	A new Policy/Strategy/Practice/Project <input checked="" type="checkbox"/> A revised Policy/Strategy/Practice <input type="checkbox"/>
C. Description of the proposal: (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate))	<p>The Scottish Environmental Protection Agency (SEPA) issued new guidance on the 31st October 2024, which banned waste upholstered domestic seating (WUDs) containing persistent organic pollutants (POPs) from being sent to landfill.</p> <p>The Council's current approach to managing WUDs containing POPs is not compliant with the new guidance.</p> <p>In order to become compliant with the new Guidance the Council will need to stop accepting, collecting, storing, transporting, and treating WUDS containing POPs as part of the mixed bulky waste stream.</p> <p>This will require multiple changes to the Council's operations. It will also impact how the Council receives and collects WUDS containing POPs from Households and Businesses via the following channels:</p>

	<ul style="list-style-type: none"> • Bulky Uplift Service • Community Recycling Centres • Waste Transfer Stations; and • Uplift of fly tipped waste. <p>For example:</p> <ul style="list-style-type: none"> • Households will need to pre-book access to the Community Recycling Centres to dispose of WUDS. • Traders will no longer be able to dispose of WUDS at CRC's. However we will accept WUDS from traders at Easter Langlee Waste Transfer Station • Households will need to make temporary repairs to any WUDS booked for uplift as part of the Council's bulky waste service.
<p>D. Service Area: Department:</p>	<p>Waste Services Infrastructure & Environment</p>
<p>E. Lead Officer: (Name and job title)</p>	<p>Ross Sharp-Dent Waste & Passenger Transport Manager</p>
<p>F. Other Officers/Partners involved: (List names, job titles and organisations)</p>	<p>Kirsty Torrie – Interim Waste Treatment Manager</p>
<p>G. Date(s) IIA completed:</p>	<p>5th March 2024</p>

Section 2 Will there be any impacts as a result of the relationship between this proposal and other policies?

No

If yes, - please state here:

Section 3 Legislative Requirements

3.1 Relevance to the Equality Duty:

Do you believe your proposal has any relevance under the Equality Act 2010?

(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)

Equality Duty

Reasoning:

A. Elimination of discrimination (both direct & indirect), victimisation and harassment. *(Will the proposal discriminate? Or help eliminate discrimination?)*

No

B. Promotion of equality of opportunity?
(Will your proposal help or hinder the Council with this)

Yes

C. Foster good relations?
(Will your proposal help to foster or encourage good relations between those who have different equality characteristics?)

No

**3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal?
(You should consider employees, clients, customers / service users, and any other relevant groups)**

Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.

	Impact			Please explain the potential impacts and how you know this
	No Impact	Positive Impact	Negative Impact	
Age Older or younger people or a specific age grouping			X	<p>The requirement to pre book access to the Community Recycling Centres may be more challenging for those in the younger and older age group. To assist booking can be made both online and via the phone.</p> <p>Those in the younger and older age groups may be more reliant on third parties (not the Council) to uplift and dispose of Waste Upholstered Domestic Items, which may become more expensive to dispose of under the new arrangement due to additional travel times/distances. The Council will continue to accept WUDS as part of the bulky uplift service, however this may not be an option that householders currently use and may already be more expensive.</p> <p>Those in the younger and older age groups may find it more difficult to undertake temporary repairs to WUDS prior to disposal or uplift.</p>
Disability A physical or mental impairment that has a substantial and long term adverse effect on a person's ability to carry out normal day to day activities. This may be visible or invisible, progressive or recurring.			X	<p>The requirement to pre book access to the Community Recycling Centres may be more challenging for those in the with disability group. To assist booking can be made both online and via the phone.</p> <p>Those in the disability group may be more reliant on third parties (not the Council) to uplift and dispose of Waste Upholstered Domestic Items, which may become more expensive to dispose of under the new arrangement due to additional travel times/distances. The Council will continue to accept WUDS as part of the bulky uplift service, however this may not be an option that householders currently use and may already be more expensive.</p> <p>Those in the disability group may find it more difficult to undertake temporary repairs to WUDS prior to disposal or uplift.</p>

Gender Reassignment anybody who is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.	X			
Marriage or Civil Partnership people who are married or in a civil partnership	X			
Pregnancy and Maternity (refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth),	X			
Race: including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)	X			
Religion or Belief: different religious or philosophical beliefs, customs (including atheists and those with no aligned belief) e.g. Christianity, Islam, Hindu, pacifism, vegetarianism, gender critical.	X			
Sex women and men (girls and boys)	X			
Sexual Orientation , e.g. Lesbian, Gay, Bisexual, Heterosexual	X			

3.3 Fairer Scotland Duty

This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making strategic decisions.

The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.

Is the proposal strategic?

Yes – The proposals are being put forward in order to comply with new guidance issued by SEPA, which is underpinned by law.

If No go to Section 4

If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:

	Impact			State here how you know this
	No Impact	Positive Impact	Negative Impact	
<p>Low and/or No Wealth – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.</p>			x	<p>The requirement to pre book access to the Community Recycling Centres may be more challenging for those in the Low and or No Wealth group due to lack of access to a phone, computer or internet.</p> <p>Those in the Low and or No Wealth group may be more reliant on third parties (not the Council) to uplift and dispose of Waste Upholstered Domestic Items, which may become more expensive to dispose of under the new arrangement due to additional travel times/distances. The Council will continue to accept WUDS as part of the bulky uplift service, however this may not be an option that householders currently use and may already be more expensive.</p> <p>Those in the Low and or No Wealth age groups may find it more difficult to undertake temporary repairs to WUDS prior to disposal or uplift.</p>
<p>Material Deprivation – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies</p>	x			
<p>Area Deprivation – where you live (e.g. rural areas), where you work (e.g. accessibility of transport), see rural proofing guidance</p>			x	<p>Those in the area deprivation group may be more reliant on third parties (not the Council) to uplift and dispose of Waste Upholstered Domestic Items, which may become more expensive to dispose of under the new arrangement due to additional travel times/distances. The Council will continue to accept WUDS as part</p>

				of the bulky uplift service, however this may not be an option that householders currently use and may already be more expensive.
Socio-economic Background – social class i.e. parents' education, employment and income	x			
Care experienced people	x			
Carers paid and unpaid including family members	x			
Homelessness	x			
Addictions and substance use	x			
Those involved within the criminal justice system	x			

3.4 Armed Forces Covenant Duty (*Education and Housing/ Homelessness proposals only*)

This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to the three matters listed below in Education and Housing/ Homelessness matters.

This relates to current and former armed forces personnel (regular or reserve) and their families.

Is the Armed Forces Covenant Duty applicable?

No

If "Yes", please complete below

Covenant Duty	How this has been considered and any specific provision made:
<p>The unique obligations of, and sacrifices made by, the armed forces;</p> <p>The <u>MOD Statutory Guidance</u> gives the following examples:</p> <ul style="list-style-type: none"> • Danger • Geographical Mobility • Separation from Family • Service Law 	

<ul style="list-style-type: none"> • Unfamiliarity with Civilian Life • Hours of Work • Stress 	
<p>The principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the armed forces;</p>	
<p>The principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the armed forces.</p>	

Section 4 Full Integrated Impact Assessment Required

Select No if you have answered “No” to all of Sections 3.1 – 3.3.

Yes

If yes, please proceed to Stage 2 and complete a full Integrated Impact Assessment

If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.

The proposals are being put forward in order to comply with new guidance issued by SEPA, which is underpinned by law and will be monitored.

Therefore, a full impact assessment is not deemed necessary, but this position may change depending on ongoing monitoring.

For clarity the Council has attempted to minimise the impacts whilst balancing the following competing issues/demands:

- The Council’s legal requirements
- The needs of householders, businesses, and traders
- The operational restrictions i.e., site location, sizes, haulage etc....
- The financial implications

Signed by Lead Officer:	Ross Sharp-Dent
Designation:	Waste & Passenger Transport Manager
Date:	3rd March 2024
Counter Signature Director:	
Date:	

APPENDIX F – Rural Proofing Checklist

The rural proofing checklist – 2009/10

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: **Waste Upholstered Domestic Seating**

Date checklist completed: **5th March 2024**

Completed by: **Ross Sharp-Dent**

	Yes	No	Summary of likely negative impacts:
<p>1. Will the policy have a negative affect on the availability or delivery of services for people living in rural areas?</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>	X		<p>Households will now need to pre-book before they can dispose of WUDS at Community Recycling Centres.</p> <p>Business will no longer be able to dispose of WUDS at Community Recycling Centres. Instead, they will be required to take WUDS to Easter Langlee Waste Transfer Station.</p> <p>Summary of adjustments made: A number of Councils now only accept WUDS at one Community Recycling Centre, for example Highlands and Renfrewshire. We are proposing that we will continue to accept WUDS from households at all sites but in order to do this we require households to pre book due to the limited capacity we have at our sites.</p> <p>We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station.</p>

	Yes	No	Summary of likely negative impacts:
<p>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?)</p> <p>For example, 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>Households will now need to pre-book before they can dispose of WUDS at Community Recycling Centres.</p> <p>Business will no longer be able to dispose of WUDS at Community Recycling Centres. Instead, they will be required to take WUDS to Easter Langlee Waste Transfer Station.</p>
			<p>Summary of adjustments made:</p> <p>A number of Councils now only accept WUDS at one Community Recycling Centre, for example Highlands and Renfrewshire. We are proposing that we will continue to accept WUDS from households at all sites but in order to do this we require households to pre book due to the limited capacity we have at our sites.</p> <p>We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station.</p>

	Yes	No	Summary of likely negative impacts:
<p>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?)</p> <p><u>For example</u>, 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?</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>Business will no longer be able to dispose of WUDS at Community Recycling Centres. Instead, they will be required to take WUDS to Easter Langlee Waste Transfer Station.</p> <hr/> <p>Summary of adjustments made:</p> <p>We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station.</p>
<p>4. Will the policy have a negative effect on the availability of affordable housing in rural areas?</p> <p><u>For example</u>, 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?</p> <p><i>Rural solutions: consider provision of alternative affordable rural housing solutions.</i></p>		x	<p>Summary of likely negative impacts:</p> <hr/> <p>Summary of adjustments made:</p>

	Yes	No	Summary of likely negative impacts:
<p>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?</p> <p><u>For example</u>, 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>x</p>	<p>Summary of likely negative impacts:</p> <hr/> <p>Summary of adjustments made:</p>

	Yes	No	Summary of likely negative impacts:
<p>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?</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>	x		<p>Although Scottish Borders Council operates a large number of Community Recycling Centres per head of population, they are relatively small. The limited space at CRC's combined with requirements of the guidelines mean that we cannot continue to allow households and businesses to deposit unlimited quantities of WUDS.</p> <hr/> <p>Summary of adjustments made:</p> <p>A number of Councils now only accept WUDS at one Community Recycling Centre, for example Highlands and Renfrewshire. We are proposing that we will continue to accept WUDS from households at all sites but in order to do this we require households to pre book due to the limited capacity we have at our sites.</p> <p>We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station.</p>

	Yes	No	
<p>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?</p> <p><u>For example</u>, 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)?</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>	x		<p>Summary of likely negative impacts: House clearance and bulky waste uplift businesses will no longer be able to dispose of WUDS at their local Community Recycling centre. In the future they will be required to travel to Easter Langlee Waste Transfer Station to dispose of their WUDS. This impact the operational costs which will need to be built into their business model.</p> <p>Summary of adjustments made: We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station. All businesses will be treated in the same manner ensuring equity of provision.</p>

	Yes	No	
<p>8. Will the policy have a negative impact on employment in rural areas?</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>Summary of likely negative impacts: Employees of house clearance and bulky waste uplift businesses may be impacted – see question 7.</p> <hr/> <p>Summary of adjustments made: We do not have the capacity to accept WUDS from businesses at our CRC's due to restricted capacity. However, although not a statutory requirement we are keen to ensure that businesses do have a disposal option for WUDS in the Borders. To enable this to happen we are accepting WUDS at Easter Langlee Waste Transfer Station. All businesses will be treated in the same manner ensuring equity of provision.</p>

	Yes	No	Summary of likely negative impacts:
<p>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?)</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>		x	<p>Summary of adjustments made:</p>

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	Yes	No	Summary of likely negative impacts:
<p>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?</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>Summary of adjustments made:</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.

