



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

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Building Waste Sector Resilience

Lessons
From The
Covid-19 Pandemic

Building Resilience – Preparing for the Future



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1. Introduction

- 1.1. On March 23 2020, the UK Government announced a range of measures aimed at curbing the spread of the Covid-19 pandemic. This included a comprehensive range of restrictions on freedom of movement, enforceable by law.
- 1.2. The Health Protection (Coronavirus, Restrictions) Regulations (Northern Ireland) 2020 came into operation on March 28 2020, with people directed to stay at home except for essential purchases, essential work travel (if remote work was not possible), medical needs, exercise and providing care for others. Other non-essential activities, including all public gatherings and social events, were prohibited, with many categories of retail businesses obligated to close.
- 1.3. For the majority in the waste sector, these have been unprecedented times, with many facing challenges which would have seemed unimaginable only a few months previous. As we navigate our way through the continuously changing landscape that the pandemic presents, it is important to reflect on our actions and our response to emerging issues and scenarios throughout the pandemic and to use the lessons developed to further enhance our contingency plans for future use.
- 1.4. This report examines the emergency response framework implemented and actions taken by the Department of Agriculture, Environment & Rural Affairs (DAERA), in relation to waste. More specifically, the parties involved were Environment Marine & Fisheries Group (EMFG), Environmental Policy Division (EPD) and the Northern Ireland Environment Agency (NIEA) who all collaborated with local government through the 11 local councils, the private waste sector and Strategic Investment Board (SIB) to provide a policy and regulatory driven response to a rapidly evolving situation during the emergency response phase. The report observes and reflects on the actions taken, collating not only the views of staff and key decision makers from within government but also from a range of external key stakeholders in local

government and the wider waste sector.

1.5. This detailed engagement and the observations around lessons learned can assist our move through recovery, living with the ‘new normal’ and building a meaningful, collaborative resilience for the challenges that lie ahead. The shared experiences and subsequent lessons can shape our behaviours, inform our decision-making and provide a useful point of reference in any future emergency situation.

1.6. The lessons developed from this exercise and the recommendations in this report will serve to provide a valuable reference to inform DAERA’s arrangements for emergency planning and response in future - in particular the arrangements for responding to and recovering from any emergencies faced by NIEA in its role as regulator of the waste industry and investigator of waste crime.

2. Responding to the Crisis

2.1. The onset of the pandemic presented many challenges which required urgent and immediate decision-making in a rapidly-changing environment. It was essential therefore that a collaborative approach between central and local government and the wider waste sector was initiated to maintain essential services and protect public health.

2.2. The prioritisation and delivery of essential services along with the dissemination of key communications around the delivery of these services, including the public health message, was crucial. From the outset, it was recognised that to mitigate the impact of Covid-19 and the lockdown restrictions, it was paramount to harness existing communication channels and strategic working groups and establish new ones where necessary.

- 2.3.** Effective from March 16 2020, the Department officially triggered the Major Emergency Response Plan (MERP)¹ to enhance our response structures and to provide the context for activating key roles, prioritising essential work and streamlining communications. Within DAERA, command response structures were implemented at Gold (Strategic Level), Silver (Tactical Level) and Bronze (Operational Level) to ensure open communication channels throughout all levels of command. A Situational Report (SitRep) was completed daily and fed through to the Departmental Operational Centre (DOC) to provide a real time overview of operations.
- 2.4.** Within NIEA and EMFG, the Covid Waste Working Group was established, meeting daily to review and agree updates for future Bronze and Silver Command meetings, discuss areas of action and agree work priorities for staff and teams. Daily updates were recorded via the Covid Waste Working Group Log with all issues monitored and tracked to resolution under strict timescales.
- 2.5.** Stakeholder engagement was managed via existing working groups with key stakeholders across local government and the wider waste sector, with new groups established promptly where necessary, to ensure positive engagement and open channels of communication.
- 2.6.** The Northern Ireland Strategic Waste Partnership (SWP) was previously established by the 11 local councils and DAERA, designed to have strategic oversight of the delivery of the Action Plan for Central and Local Government to manage Northern Ireland's Municipal Waste. The DAERA members of the SWP are responsible for reporting back to the DAERA Waste Strategy Board while the Society of Local Authority Chief Executives (SOLACE) members of the SWP are responsible for reporting back to the 11 local councils via an agreed governance arrangement. With the onset of the pandemic and emergency response, the SWP increased the frequency of meetings to weekly.

¹ <http://nics.intranet.nigov.net/daera/articles/major-emergency-response-plan-merp>

- 2.7.** The Government Waste Working Group (GWWG) was another group which was already operational, providing a partnership forum for Central and Local Government to collaboratively address operational matters relating to the management of municipal waste. The GWWG meetings were increased in frequency from quarterly to weekly when the emergency response plan was initiated.
- 2.8.** The 4 Agencies meetings were set up to discuss, at a strategic level, how each of the Environment Agencies responded to the Covid-19 pandemic, including active and recovery phases. This approach facilitated the swift sharing of information, and a co-ordinated approach to implementing Regulatory Positions in each of the jurisdictions on a weekly basis.
- 2.9.** The 4 Nations Covid Contingency Group was formed at the beginning of the pandemic to share experiences and discuss emerging issues between policy colleagues in the four administrations on a weekly basis. The group acted as a forum to highlight particular challenges that a jurisdiction may have been facing so that in turn the other jurisdictions could put in place plans to mitigate these. The collaborative distribution of communications assets and concepts within this group assisted in keeping the public better informed.
- 2.10.** The DEFRA Waste Sector Recovery Planning Group was formed to bring representatives from the Environment Agency and the private and public waste sector, mainly from England but with some wider Great Britain representation together on a weekly basis. This included information on challenges facing local authorities, updates on recycle markets and details on legislative changes in England. DAERA were silent observers to this meeting but were able to use it to gather information about issues facing the private and public waste sectors and use this to assess the need for particular interventions here in Northern Ireland.
- 2.11.** A Private Waste Sector Grouping for Northern Ireland was also established at the beginning of the pandemic, meeting on a weekly basis, to engage with the

sector to ensure that capacity was available to handle waste collections and that waste flows to reprocessors were maintained throughout the crisis.

2.12. Engagement with all 11 local councils at the beginning of the initial lockdown identified that it would be best to co-ordinate communication through nominated officers within each council for all Covid-19 related waste contingency communications. This approach ensured that the key messages in relation to waste and recycling services during the pandemic were delivered with a consistent, coherent theme from DAERA, local councils and the wider waste sector. This collaboration worked well and ensured an effective communication campaign which involved all council stakeholders.

2.13. All of this was accompanied by an informed communications campaign utilising the previously established NI National Communications Advisory Panel (NCAP) for recycling communications, supported by DAERA and administered and delivered by the Waste & Resources Action Programme (WRAP). Clear, consistent messaging was developed on the pressing issues and delivered through a range of media platforms along with a leaflet drop campaign to every household in Northern Ireland. Messages included Protect & Respect, Keep Recycling, Fly-Tipping & Littering, Bin Hygiene & PPE Littering and a range of assets were produced around these and subsequently utilised by a number of other groups, including all 11 local councils on their websites and social media feeds. This was further complemented by communications issued from DAERA Press Office, Keep Northern Ireland Beautiful (KNIB), MyNI and others.

2.14. This collaborative approach of maintaining frequent dialogue, reporting and information sharing allowed for the continued delivery of essential services throughout the pandemic while mitigating the risk to all of our staff, frontline workers and the wider public.

3. Recovery

3.1. Recovery presents many challenges in the environment of an ongoing pandemic, however, it is also clear that where challenges exist, so too do

opportunities. As society and the economy adjusts to the new normal, it does so following strict social distancing protocol aimed at protecting the health and well-being of staff, service users and the general public.

- 3.2.** According to a recent report by WRAP entitled “*How moving to a Circular Economy can help the UK to Build Back Better*”², they promote the idea that any recovery from Covid-19 must also be environmentally sustainable. WRAP believes that any environmentally sustainable recovery must include a move towards a more circular economy, through the adoption of innovative new business models and a much greater focus on waste prevention, reuse and recycling.
- 3.3.** The report asserts that once the economy starts to fully re-open, further policy measures can be expected as Government try to accelerate the recovery and minimise job losses. What form these policy measures take will depend on the type of recovery that is wanted, however a return to ‘business as usual’ is unlikely to be either possible or desirable. Simply rebuilding the economy just as it was before the pandemic would not improve the UK economy’s resilience to future major supply chain shocks, according to WRAP. More positively however, since the economy needs to be rebuilt, an opportunity exists to do this in a way that makes it more sustainable, an objective which has received widespread support from the public over recent years. This has led to the concept of ‘**Build Back Better**’.
- 3.4.** Our continued dependence on imported raw materials and products means that we remain at risk of disruptions to critical business supply chains, while exposure to volatile commodity prices presents risk and uncertainty to business and the economy at large. More circular use of materials has the potential to reduce exposure to this uncertainty while reducing supply chain risk, keeping our resources in use for as long as possible and within the region. WRAP recommend that governments, regions, cities and businesses across the UK

²<https://wrap.org.uk/sites/files/wrap/How%20a%20Circular%20Economy%20can%20help%20us%20Build%20Back%20Better.pdf>

should adopt a **'Target, Measure, Act'** approach to increasing the circularity of their activities.

3.5. Stakeholders require certainty on the direction and speed of travel in order to invest. It is therefore important, according to WRAP, that the UK Government accelerates the integration and implementation of the policies in these three strategies as part of any post-Covid recovery, in order to gain the environmental and economic benefits that they will bring.

4. A Critical Look at Performance

4.1. As part of this recovery and in order to learn from this crisis, it was important to take a critical look at performance. Once the first peak of the Covid-19 pandemic had passed we reflected upon our actions throughout the crisis and began to critically examine the decisions made and the resources employed in our response. This examination has presented an opportunity to enhance collaboration and improve efficiency across central and local government and the wider waste sector while also increasing our resilience for future scenarios. It was necessary therefore to proactively seek the input of internal and external stakeholders across the sector to gauge opinion on performance throughout the pandemic and identify the strengths or weaknesses which exist. This feedback was essential in order to develop lessons to assist in the event of a future crisis.

5. Methodology

5.1. The initial stage of the engagement process involved contacting a wide range of key internal and external stakeholders across the sector and inviting input to this exercise. Internally, staff from across EPD and NIEA were invited to contribute, while externally input was requested from SIB and all local councils via their heads of waste services through the GWWG and via a representative group of their Chief Executives through the SWP. A range of representative

bodies, waste management groups and key stakeholders from across the private waste sector were contacted for contributions also.

- 5.2.** Contributors were invited to provide open, honest and raw observations about what they believed worked well, what did not, or simply any other relevant comments on the management of services throughout the crisis. The response rate and engagement both internally and externally was very positive although the number of observations from the private sector was less than expected.
- 5.3.** Following a consultation process between central and local government, the majority opinion among stakeholders was that DAERA should progress the initial report, identify the main issues and develop a draft lesson for each of the main issues. It was further agreed that DAERA provide appropriate commentary around the minor issues.
- 5.4.** A further consultation exercise was conducted to reach agreement on the major issues before a workshop involving a range of stakeholders was organised to fully develop lessons from these issues.
- 5.5. Appendix A** contains a list of all 104 issues complete with contributors by sector.
- 5.6. Appendix B** contains full details of all 83 issues which had 3 or less observations and provides commentary around these issues which were not progressed to develop a full lesson.
- 5.7. Appendix C** is a quick reference guide to the lessons developed following the process of engagement and collaboration. During development of the lessons it was recognised that some major issues were so inter-linked that they were best dealt with by one lesson. In total 12 lessons were developed.

6. The Observations

- 6.1** A comprehensive and diverse set of observations and opinions have been received around a range of key issues, and decisions made around these issues, throughout the pandemic. A total of 250 observations were received from contributors and these have been analysed and collated into 104 separate issues (**Appendix A**). These issues have been categorised under 10 headings for discussion, outlined briefly in the following paragraphs. Any observation which was raised by 4 or more respondents during the consultation was brought forward for further discussion and development as a future lesson.
- 6.2. Household Waste Recycling Centres (HWRCs) & Fly-Tipping** – 34 observations were received in respect of HWRCs and fly-tipping and collated into 13 separate issues, 3 of which were brought forward to develop and produce a lesson.
- 6.3.** 39 observations were made in relation to **Emergency Planning & Business Continuity** and these were collated into 23 different issues, of which only 1 was forward to develop and produce a lesson.
- 6.4.** Observations around **Working Groups & Partnerships** received a total of 74 contributions which were collated into 21 distinct issues, 7 of which were brought forward to develop and produce a lesson.
- 6.5. Communications** received a total of 16 observations, grouped into 9 different issues with only 1 of these brought forward to develop and produce a lesson.
- 6.6.** Contributions regarding the **Waste Sector & Recyclate Markets** counted for 46 observations around 17 issues, 4 of which were brought forward to develop and produce a lesson.
- 6.7. Supply Chain & Procurement** received 13 observations combined into 5 different issues, 2 of which were brought forward for development as a lesson.

- 6.8. Finance received** 8 observations collated into 6 distinct issues, none of which were brought forward for further development.
- 6.9. Staff** received 9 observations collated into 6 issues with 1 of these brought forward to develop a lesson.
- 6.10. Agile Working** received 9 observations which were collated into 2 issues with both issues brought forward for further discussion and development
- 6.11. Other** input amounted to 2 observations which made up 2 issues however neither of these issues were brought forward for further development.

7. Overview of Minor Issues

- 7.1.** Having followed the process detailed above, the 83 issues with 3 or less observations were examined and analysed by DAERA officials. Relevant commentary has been developed around each of these issues, and where appropriate this commentary refers to one of the lessons which have been developed. These issues were discussed comprehensively among stakeholders via an online survey and while they were not progressed to develop a lesson, their significance and importance is in no way diminished. These issues remain valuable contributions and have been the subject of detailed discussion which can influence future decision-making in challenging situations.



8. Overview of Major Issues & Lessons Learned

The major issues brought forward by consensus are detailed in the following paragraphs including an associated lesson. While a total of 21 major issues were identified and brought forward for development as a future lesson by virtue of receiving 4 or more observations, some of the issues are so closely linked that it has been possible to deal with these by way of a single lesson. Therefore, whilst 21 major issues were brought forward, a total of 12 final lessons were developed for future reference. Please refer to Annex A for details on which sector the original observations came from and the number of observations made in respect of each issue.

8.1. HWRCs & Fly-Tipping

HWRCs and Fly-Tipping received a total of 34 observations, collated into 13 separate issues, 3 of which received 4 or more observations from respondents. These 3 issues are outlined below accompanied by an associated lesson.

Issue No 1: The lack of a consolidated approach from local Councils over the HWRC closures created confusion and anger among the general public. The HWRCs should have offered a reduced service rather than closing completely.

Issue No 3: The HWRCs should have offered a reduced service rather than closing completely.

Lesson No 1 – The closure of Household Waste Recycling Centres (HWRCs) put a strain on waste management resources and generated a level of disquiet among the general public. The future aim must be to maintain services at HWRCs even on a restricted capacity, taking into account the availability of resources.

Issue No 2: There was lack of clarity in the Regulations, in particular around what constituted ‘essential travel’ and this caused a delay in re-opening the HWRC’s.

Lesson No 2 - HWRCs were not specifically listed as an operation or activity to close by the Health Protection (Coronavirus, Restrictions) Regulations (Northern Ireland) 2020 and therefore a complete closure was not required. Article 25 of the Waste and Contaminated Land (Northern Ireland) Order 1997 requires local councils to provide “places at which persons may deposit their household waste at all reasonable times free of charge”. ‘Essential travel’ should not have been an issue for debate around closure of the HWRCs and sites should have remained open (even on a reduced service) and the public make the judgement on whether their travel was ‘essential’.

However DAERA recognise that some councils were not content with the initial lack of clarity within the Regulations on whether travel to HWRCs was permitted. Many councils engaged legal advice with regard to re-opening HWRCs in their area and conflicting legal advice resulted in some councils adopting different positions. On 14 May 2020 it was announced that

HWRCs fell within the scope of ‘*critical public services*’, as outlined in regulation 5(2)(i), thereby permitting travel to HWRCs and removing any lack of clarity in the Regulations.

The lesson has been learned that HWRCs provide an essential service and that every effort should be made in future to maintain services at all HWRC sites in line with Lesson 1 in the event of any future emergency and this should be made clear in any future emergency Regulations or guidance.

8.2 Emergency Planning & Business Continuity Actions

Emergency Planning & Business Continuity Actions received 39 observations collated into 23 separate issues, only 1 of which received 4 or more observations from respondents. This single issue is outlined below accompanied by an associated lesson.

Issue No 14: The pandemic illustrated the importance of a robust contingency plan should a lockdown occur again. Any contingency plan must be a collective effort including all sectors.

Note the issue below was within the category of staffing but was so interlinked with emergency planning and business continuity it has been amalgamated in order to develop a single lesson on both these issues.

Issue No 100: Initial projections regarding the impact of Covid-19 were flawed and this skewed modelling and decision-making around staffing as the crisis progressed

Lesson No 3 - The importance of robust contingency and continuity planning in mitigating the impact of major shocks has been acutely highlighted during the pandemic. The *Building Waste Sector Resilience* report can sit alongside the NIEA Contingency Plan and be used in future to support the Department's Major Emergency Response Plan (MERP) in respect of contingency support for waste services. Central and Local Government must continue to work collaboratively to develop dynamic contingency plans, capable of coping with various emergency scenarios while maintaining essential services.

8.3 Working Groups & Partnerships

Working Groups & Partnerships received 74 observations collated into 21 separate issues, 7 of which received 4 or more observations from respondents. These 7 issues are outlined below accompanied by an associated lesson.

Issue No 40: The Strategic Working Groups were a valuable tool, increasing communication and understanding between government, councils and the wider waste sector. Harnessing & building on existing contact mechanisms such as SWP & GWWG has proved invaluable, increasing efficiency in communications and allowing the early identification of emerging issues. Relationships have been developed and strengthened and this will prove a lasting benefit.

Issue No 41: There was good collaboration between EPD & NIEA with consistent, regular engagement throughout the pandemic, harnessed by the establishment of the Covid Waste Management Group. This worked well, with clear objective and direction and it is important to reflect on the positive aspects of our contingency planning.

Issue No 46: The establishment of the waste sector group, chaired by NIEA/EMFG Grade 3s, was very positive and provided the sector with the opportunity to highlight issues directly to top DAERA management.

Lesson No 4 – We recognise the value of the collaboration via the various working groups and this should continue (albeit at a reduced frequency in non-emergency times). The chairmanship for each of these groups will ensure that participant lists are current and appropriate and, in the event of a future emergency, these groups should all be prepared to increase the frequency of meetings as required.

Issue No 47: The structures put in place did not include all stakeholders.

Lesson No 5 – DAERA are committed to engaging with a wide range of stakeholders however working groups will always require a limit to participation to remain feasible and productive. Representation from across central and local government, NIEA, representative bodies and other organisations and groups across the waste sector can ensure that all sectors have a voice and the work of the groups remains collaborative and wholly representative. As with Lesson No 4, the chairmanship of each of these groups will ensure that participant lists are current and appropriate.

Issue No 49: There appeared to be significant duplication in meetings which seemed to mirror the normal arrangements for waste but at an enhanced frequency.

Issue No 51: Dealing with a range of individuals at different levels around the same issue was frustrating. The process became over-complicated and lead to mixed messages, particularly in dealing with contractors.

Lesson No 6 - The gravity and evolving nature of the pandemic meant that command structures and groups met at an enhanced frequency and it was almost inevitable that some level of duplication would occur. Establishing central points of contact (and an alternative) for particular key issues may be a way of mitigating areas of duplication in future.

DAERA, in collaboration with key stakeholders in local government, sought open communication to deliver consistent and clear messages around emerging issues in order to maintain essential services and these communication channels can be quickly reactivated if required.

Please also refer to the wider commentary around Communications in Appendix B also.

Issue No 57: The important role of SIB particularly with the formulation and continual development of the Municipal Waste Tracker was extremely beneficial. The significant value of metrics via the waste tracker in communications, allowing us to provide, accurate timely updates for DOC/MERP/senior management and 4 Nations.

In addition, although the SIB waste sector support scheme may not have been used, the scheme is now in place and ready for use in future if required.

Lesson No 7 – SIB played an important role for waste services throughout the pandemic, developing the Municipal Waste Tracker (MWT), the Driver/Mechanic Volunteer Scheme and more recently a Fly-tipping App, which is discussed in greater detail in Appendix B. The infrastructure for all of these tools remains in place for future use if required. While recognising that SIB do not have infinite resources, their services and the tools developed by them should be employed in the event of future emergency situations where required.

Please also see Issue 13 in Appendix B.

8.4 Communications

Communications received 16 observations collated into 9 separate issues, 1 of which received 4 or more observations from respondents. This issue is outlined below accompanied by an associated lesson.

Issue No 61: DAERA Minister was engaged on all of the waste aspects throughout the pandemic while communications were simple, coherent and consistent

++++

Lesson No 8 - The acknowledgement of waste workers as essential key workers, Protect & Respect, Keep Recycling, Fly-Tipping & Littering, Bin Hygiene & PPE Littering were just some of the key messages the Minister delivered personally on social media, indicating his level of engagement on waste matters.

The collaborative approach to communications between DAERA, local councils and other stakeholders across the sector ensured key issues, and messages around these issues, received consistently high levels of exposure throughout critical periods and illustrates the importance of having the Minister engaged also.

8.5 Waste Sector & Recyclate Markets

Waste Sector & Recyclate Markets received 46 observations collated into 17 separate issues, 4 of which received 4 or more observations from respondents. These 4 issues are outlined below accompanied by an associated lesson.

Issue No 70: The lack of a robust, local recyclate industry presents an opportunity to examine how the recyclate industry here can support green growth, the circular economy and more local markets in future.

Issue No 75: There was a distinct lack of knowledge and understanding of the local and national market and therefore this was not fully recognised or harnessed during the pandemic.

Lesson No 9 – Throughout the pandemic DAERA received regular updates via WRAP providing the most current information in respect of the national recycle industry, while local engagement was maintained via the Private Waste Sector Group and a national UK perspective ascertained through weekly meetings with DEFRA. This engagement ensured DAERA had an informed view of the market throughout the pandemic and this approach should continue in future. The pandemic has made it clear that there is a need for a strong, local circular economy and the development of the Circular Economy Strategic Framework and the Green Growth Strategy will take this lesson forward.

Issue No 73: Waste services being classed as an essential service and waste workers being recognised as key workers was an important step in maintaining waste services, notably with local councils. The public acknowledgement of this by the DAERA Minister was also significant and provided a timely morale boost.

Issue No 83: The positive public reaction and support for waste industry staff was well received and provided a timely boost.

Lesson No 10 – The pandemic has shown clearly that waste services are an essential service and should always be recognised as such in future. We must continue to promote the key message of ‘Protect & Respect’ for waste workers across the industry.

8.6 Supply Chain & Procurement

Supply Chain & Procurement received 13 observations collated into 4 issues with 2 of these issues receiving 4 or more observations from respondents. These 2 issues are outlined below accompanied by an associated lesson.

Issue No 84: A shortage of PPE, guidance regarding the use of PPE and wider H&S issues was a problem for some Councils. Common areas included social distancing measures, guidance around vehicles & crews and the sanitising of vehicles. Consistency of approach was not apparent across all Councils. A collaborative NI/Entire Local Council-led bulk procurement of PPE would have provided a better approach.

Issue No 85: A collaborative NI/Entire Local Council-led bulk procurement of PPE would have provided a better approach.

Lesson No 11 – A uniform or ‘one size fits all’ approach across all local councils is maybe implausible given the diverse, and quite often unique, range of challenges facing individual councils at any particular time. Nevertheless, as with Lesson 3, Central and Local Government should continue to work collaboratively to develop dynamic contingency measures, possibly exploring further a collaborative procurement exercise for specific items, which may mitigate such pressures in future.

8.7 Staff

There were a total of 9 observations received in respect of **Staff** collated into 6 separate issues, with 1 of these issues receiving 4 or more observations from respondents. This issue is outlined below and although originally raised as a staffing issue it was so closely linked with business continuity planning that it was effectively addressed and developed by way of Lesson No 3.

Issue No 100: Initial projections regarding the impact of Covid-19 was flawed and this skewed modelling and decision-making around staffing as the crisis progressed

Although originally raised as a staffing issue, this was so closely linked with business continuity planning that it was effectively addressed and developed by way of Lesson No 3.

8.8 Agile Working

9 observations were received around **Agile Working** collated into 2 issues which received more than 4 observations. These 2 issues are outlined below accompanied by an associated lesson.

Issue No 101: The pandemic has now given way to an opportunity to fully embrace and incorporate new working practices.

Issue No 102: Using & embracing all available technology allowed agile working with minimal disruption.

Lesson No 12 – Our response to the pandemic has demonstrated that a much greater opportunity existed to work from home than was recognised before the onset of COVID-19. It is important that people have the opportunity to return to their place of work, where it is possible to do that safely, however DAERA recognise the opportunities that now exist for agile working in many roles and the significant benefits associated with that but we also recognise that not all roles can be carried out remotely.



9. Recommendations and Next Steps

- 9.1.** This document will form part of future EMFG and NIEA contingency plans and should be referenced and implemented, where applicable, in the event of a future emergency situation being declared. The lessons in Appendix C should be referred to in formulating any response to a crisis involving the waste sector.
- 9.2.** This document should be reviewed initially within 12 months to determine if actions have commenced or issues have been addressed so that a risk assessment can be made. The document should subsequently be reviewed after 5 years if it has not been activated. If activated, the document should be reviewed following its next use.



Appendix A – Tally of all 104 Issues

No.	Observation	Raised By
Household Waste Recycling Centres (HWRCs) & Fly-Tipping		
1.	The lack of a consolidated approach from local Councils over the HWRC closures created confusion and anger among the general public.	+++++ +++
2.	There was lack of clarity in the Regulations, in particular around what constituted ‘essential travel’ and this caused a delay in re-opening the HWRC’s.	+++ +
3.	The HWRCs should have offered a reduced service rather than closing completely.	+++++ ++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
4.	The closure of the HWRCs caused a range of issues during the lockdown. Stockpiling of waste was exacerbated with many people furloughed or working from home and more waste than usual being generated. There is an indication that this resulted in a significant increase in the number of fly-tipping incidents.	+
5.	A Ministerial announcement, backed by the Dept of Health and the Executive was required for the re-opening of the HWRCs to instil confidence in councils.	+
6.	Greater consistency required between central and local government with regard to interpretation of the Regulations e.g. Councils were left without guidance for a period of 1-2 weeks in relation to the HWRCs re-opening.	+++
7.	The lack of a collaborative approach from Councils resulted in a very diverse delivery as the HWRCs re-opened.	+
8.	The re-opening of the HWRCs was very well received and without disruption.	+
9.	The whole HWRC issue could have been depoliticised had the position of the Minister been clarified much earlier.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
10.	Misinformation and poor reporting standards on fly-tipping was used to force the re-opening of the HWRCs.	+
11.	There was an initial failure to engage with the PSNI regarding the re-opening of the HWRCs.	+
12.	The closure of the HWRC’s led to a (perceived) increase in fly-tipping which became the focus of political, media and public pressure.	+++
13.	<p>Many Councils were unable to provide any data on fly tipping in the early stages of the pandemic while discrepancies in the reporting of fly-tipping also became apparent.</p> <p>SIB collected fly-tipping data from councils as part of the Municipal Waste Issues Tracker. Each Council has its own process of recording incidents in terms of scale and nature/type of waste. Given the inconsistency in reporting, the data provided could not be relied upon to make reliable comparisons, draw conclusions or allocate resources.</p>	+++
Emergency Planning & Business Continuity Actions		

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
14.	The pandemic illustrated the importance of a robust contingency plan should a lockdown occur again. Any contingency plan must be a collective effort including all sectors.	++ ++
15.	The 'Lessons Learned' exercise will allow us to develop a stronger set of FAQs for responding to future shocks	+
16.	A database of key staff across EPD, NIEA and local Councils should be created, detailing contact details and job role and responsibilities. This should be reviewed annually.	+
17.	The existing NIEA database including contacts within local Councils and the wider waste sector facilitated a rapid assessment of what was happening on the ground.	+
18.	The publication of Regulatory Position Statements were timely and well-received by many stakeholders.	+++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
19.	More detail should have been provided to all staff on the internal structures for the emergency response. This should have included individual and collective responsibilities and cross-Departmental interactions. .	+
20.	The streamlining of the DOC process was positive and removed unnecessary layers of bureaucracy.	+
21.	Local Council contingency plan(s) for a pandemic were not evident.	+
22.	NIEA paused their routine inspection programme during the pandemic however they maintained the capability to respond to incidents where there was risk to human health or the environment.	+
23.	There was considerable confusion to begin with in respect of operational matters. During this period, contractors were approached verbally on operational issues without any regard for existing contractual arrangements or possible future financial consequences.	++
24.	Key DAERA staff leading work streams delivered timely outputs.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
		++
25.	There was an evident lack of preparatory emergency planning at Group and Departmental level.	+
26.	There appears to be a lack of legislative means to take emergency action to deal with waste going to landfill.	+
27.	The domestic kerbside collection system experienced issues in some areas raising questions over how adaptive and responsive these services are.	+ ++
28.	There was a lack of advance notice of operational decisions which made it difficult to prepare for or manage.	++ +
29.	An initial shortage of drivers for bin lorries caused problems.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
		++
30.	DAERA were aware that Covid-19 was an issue in February 2020 however it was w/c 16 March 2020 before work was initiated. The warning signs were there and the Department should have been better prepared.	+
31.	The Driver/Mechanic Volunteer scheme was set up to provide support to Councils impacted by Covid-19. The scheme was a good example of private sector drivers working closely with the public sector for the good of society. A significant amount of work went into developing the scheme however by the time the scheme 'went live' a lot of furloughed drivers had returned to work, which meant that the full potential of the scheme was not realised.	+ +
32.	There appeared to be a lack of contingency planning by 3 rd party contractors in the waste sector.	++
33.	The full potential benefits of using GIS were not realised during the pandemic. This is an area that should be developed further, particularly for DAERA/NIEA, as it allows for a more professional approach to data presentation and a streamlined way to deal with issues/queries.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
34.	A degree of panic set in where decision-making and planning was reactive rather than utilising and trusting internal processes already developed.	+
35.	The Business Continuity Plan (BCP) was not referred to throughout the pandemic, indicating that it was probably not fit for purpose. We must ensure that continuity plans are relevant, compliant, regularly tested and fit to be implemented when required.	+
36.	All aspects of the business were fully risk-assessed at the beginning of the pandemic, ensuring the safety of our staff was paramount while continuing to service key infrastructure. We examined our business resources to examine diversification into other key and critical areas. Although not implemented this time it can be used in future if necessary.	+
Working Groups & Partnerships		
37.	The desire by local and central government to work together to develop solutions was very positive, as was the public visibility of this collaboration.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
38.	The Municipal Waste Tracker records a council's assessment of their ability to cope however we need to establish if this is based on a common set of criteria across all councils.	+
39.	The Municipal Waste Tracker was used very effectively during the Covid-19 crisis to report to the most senior levels within Central and Local Government. The MWT provided a real time view while also showing emerging trends over a number of weeks. Using the RAG reporting system, it was possible to identify where the greatest pressures were in the supply chain and it became a central repository for all the key information in relation to MSW.	++ +
40.	The Strategic Working Groups were a valuable tool, increasing communication and understanding between government, councils and the wider waste sector. Harnessing & building on existing contact mechanisms such as SWP & GWWG has proved invaluable, increasing efficiency in communications and allowing the early identification of emerging issues. Relationships have been developed and strengthened and this will prove a lasting benefit.	+++++ ++++ +++++ ++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
41.	There was good collaboration between EPD & NIEA with consistent, regular engagement throughout the pandemic, harnessed by the establishment of the Covid Waste Management Group. This worked well, with clear objective and direction and it is important to reflect on the positive aspects of our contingency planning.	+++++ +++
42.	In the main there was good collaboration and a drive for consistency among the 11 local councils. This enabled the streamlining of working models and systems and the prioritisation of key issues. This work was supported by the strategic working groups and regular meetings.	+
43.	The 4 Nations meetings were valuable for information sharing and learning from each other	++
44.	The ability to assess and understand issues quickly allowed informed briefings to be provided to Gold Command and CCG (NI).	+
45.	There must be clear direction to councils that all dealings with waste should go to the lead department i.e. DAERA in the first place. This feeds into the related point that not all councils were brought into GWWG representation	++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
	from the outset, as illustrated when BCC announced they were stopping blue & brown bin collections. Opinions from individual councils require a platform however there appears to be no collective voice.	
46.	The establishment of the waste sector group, chaired by NIEA/EMFG G3s, was very positive and provided the sector with the opportunity to highlight issues directly to top DAERA management.	+++ +++
47.	The structures put in place did not include all stakeholders.	++++ ++
48.	DAERA engaging with industry directly runs the risk of policy drift or creating a hierarchy of groups/individuals within the waste industry.	+
49.	There appeared to be significant duplication in meetings which seemed to mirror the normal arrangements for waste but at an enhanced frequency.	++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
		++
50.	Perception of too much information from lots of sources, and that the information being shared wasn't necessarily coherent or correct. A small working group of those with applicable skills could have led to quicker decision making – would allow clear messaging and give responsibility to an agency to deliver for example “NIEA in conjunction with CIWM state”.	+
51.	Dealing with a range of individuals at different levels around the same issue was frustrating. The process became over-complicated and lead to mixed messages, particularly in dealing with contractors.	+++ ++++
52.	CCGNI exacerbated issues rather than working towards solutions	+
53.	DOC queries were not dealt with in a timely manner by other Departments	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
54.	The insistence on micromanagement and centralised decision-making has the potential to cause severe inertia to be responsive to problems	+
55.	There was significant time spent on engagement with individual councils and private waste companies during the initial stage of restrictions to provide reassurance.	++
56.	Good, agile and adaptive communications was delivered to external stakeholders, in particular the use of existing partnerships and structures, such as NICAP	+
57.	<p>The important role of SIB particularly with the formulation and continual development of the Municipal Waste Tracker was extremely beneficial. The significant value of metrics via the waste tracker in communications, allowing us to provide, accurate timely updates for DOC/MERP/senior management and 4 Nations.</p> <p>In addition, although the SIB waste sector support scheme may not have been used, the scheme is now in place and ready for use in future if required.</p>	<p>+++++</p> <p>++</p> <p>+</p>

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
Communications		
58.	From quite an early stage in the crisis, the lines of communication and reporting worked really well and were streamlined. DAERA set who was responsible for what within its reporting lines. There was a slightly delayed reaction from Local Government in the early weeks of the pandemic and it was initially unclear who the main points of contact were.	+
59.	Council engaged the public largely through a social media campaign and public support was very positive.	++
60.	Communication throughout the pandemic was excellent from NIEA	+
61.	DAERA Minister was engaged on all of the waste aspects throughout the pandemic while communications were simple, coherent and consistent	++++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
62.	Overall, communication was very good with clear, concise information with a regional approach	++
63.	The Minister was engaged with waste issues during the pandemic but it is worth noting for future that this intensifies the focus from the public, media and political quarters.	+
64.	In regard to local Councils a central co-ordinating officer for Comms was very beneficial	+ + +
65.	The visit to a private waste sector site was a very positive move, showing government visibility and leadership and providing a morale boost and reassurance to workers in the waste industry.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
66.	There was continual messaging with Councils particularly in the early days of the restrictions around the need for them to maintain kerbside collections	+
Waste Sector & Recyclate Markets		
67.	Understanding the importance of mitigating the impact of the pandemic on the whole supply chain. – e.g. HWRCs, collectors, recyclate processors, export markets, manufacturers.	+
68.	The pandemic and lockdown has presented an opportunity for Councils involved in the contract with Bryson House to develop relationships and progress the introduction of the kerb sort box system and establish a more stable recycling platform going forward.	+
69.	The fragility of the local recyclate market has been exposed throughout the pandemic. The global nature of the crisis illustrated that in normal times, the local recycling industry can operate within the global commodity markets -	++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
	trading paper, plastic, textiles, RDF, etc. competing against virgin materials and other countries recycling. However when demand falls, the continuous production of waste cannot be paused in the way that the production of virgin materials can be. In the global commodity market, NI is not a major player and if Government wants to encourage more local reprocessing it needs to be recognised that it will be moving away from a model of combined economic & environmental sustainability, towards a model of subsidised industry that is not sustainable in its own right. Governmentt need to recognise the long term financial burden that will accompany a local reprocessing model.	
70.	The lack of a robust local recyclate industry presents an opportunity to examine how the recyclate industry here can support green growth, the circular economy and more local markets in future.	+++ +++
71.	The systems for managing waste coped well at the height of the pandemic, with Councils and processors maintaining frontline services and recycling/disposal outlets continuing to function. In relation to markets for recycling e.g. textiles an over-reliance on a small number of processors and end markets in other countries has had, and will continue, to have profound impacts.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
72.	Information regarding the skill base of local companies within the sector was not readily available. Having this information to hand may have helped formulate a more rapid and robust response. A comprehensive, well maintained directory or database would prove very beneficial for NIEA/EMFG in future.	+
73.	Waste services being classed as an essential service and waste workers being recognised as key workers was an important step in maintaining waste services, notably with local councils. The public acknowledgement of this by the DAERA Minister was also significant and provided a timely morale boost.	+++++ ++++ ++
74.	Waste workers and waste services should have been deemed an essential service immediately and should not have taken as long as it did. Waste companies were using multiple letters from essential clients however a permit issued and regulated by NIEA from the beginning would have worked much better. This would also have prevented the need for other agencies issuing such letters.	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
75.	There was a distinct lack of knowledge and understanding of the local and national market and therefore this was not fully recognised or harnessed during the pandemic	+++ ++++
76.	There was little understanding of business support available to the wider waste sector which only served to increase the perceived waste sector isolation from core Invest NI support and engagement tools.	+
77.	There appears to be no central organisation to represent waste sector in NI. Does Recycle NI fulfil this function and if so, were they utilised and engaged sufficiently as a representative organisation?	+
78.	There is a (perceived) distrust between the private waste sector and local councils ie competitive versus collaborative	+
79.	The pandemic showed that many council contracts are lacking the flexibility to adjust to a crisis – such as diversion from landfill	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
80.	Shared resources could be looked at by councils if current contractors are unable to meet demand in the short term however this could prove difficult with a private sector waste industry in NI.	+
81.	Councils had limited control over access to treatment facilities	+++
82.	The pandemic highlighted the over-reliance on 3 rd party contractors within the waste industry with commercial operators looking after their own interests rather than focussing on service provision.	+++
83.	The positive public reaction and support for waste industry staff was well received and provided a timely boost.	+++ +
Supply Chain & Procurement		

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
84.	A shortage of PPE, guidance regarding the use of PPE and wider H&S issues was a problem for some Councils. Common areas included social distancing measures, guidance around vehicles & crews and the sanitising of vehicles. Consistency of approach was not apparent across all Councils.	++ +++
85.	A collaborative NI/Entire Local Council-led bulk procurement of PPE would have provided a better approach	++++
86.	Thorough risk assessment and contingency planning ensured essential PPE was adequately stocked.	+
87.	Frequently examining supplier resilience and monitoring the supply chain was vital and ensured our ability to source material even in the emergency situation.	+
88.	Consideration should now be given to the centralisation of guidance and operational practices from Councils	++
Finance		

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
89.	There was significant confusion around finance, particularly additional Covid related funding, and which Department was responsible. This needs to be addressed for any future 'Major Emergency' in terms of lead roles etc.	++
90.	Clarity is required re lead roles and responsibilities rg DAERA and DfC re finance bid.	+
91.	There was a lack of direction from DoF on Covid financial assistance to provide support to Councils	+
92.	The pandemic exposed the fact that the external Council spend is to the detriment of internal investment.	+
93.	It is clear now that Councils should be exploring possible new revenue streams for waste eg bulky waste collections, charging contractors for using HWRCs etc	+ +

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
94.	Financial assistance has been sought from NIEA in the form of a subsistence fee reduction or deferral and it is hoped this is still being considered. While some private waste companies (largely those servicing the domestic market) are thriving, others (servicing commercial and industrial sectors) are suffering.	+
Staff		
95.	There was strong leadership and direction from senior management during the crisis, including elected representatives and this motivated staff on the ground.	+
96.	There are concerns that SIB was pulled into operations in a manner which is not sustainable, or that could lead to potentially unrealistic expectations of their future role for some in local government.	+
97.	There was a lack of Departmental engagement with waste sector TUS	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
98.	The pandemic illustrated the resilience of Council staff & TUS and their support for Councils efforts to keep services going	+
99.	There is a clear lack of experience and training on capturing observations for lessons for future emergency situations.	+
100.	Initial projections regarding the impact of Covid 19 was flawed and this skewed modelling and decision-making around staffing as the crisis progressed. Eg Council leisure staff were initially advised to stay at home however this was soon followed by a request for volunteers from the same leisure staff for redeployment. More astute contingency planning would have seen staff re-deployed from the beginning and more essential services could have remained fully operational.	++++
Agile Working		
101.	The pandemic has now given way to an opportunity to fully embrace and incorporate new working practices	+++

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

No.	Observation	Raised By
		++
102.	Using & embracing all available technology allowed agile working with minimal disruption	++ ++
Other		
103.	A greater number of community litter picks occurred owing to an apparent increase in civic pride and this is something that should be harnessed now.	+
104.	Having a devolved approach to guidance is simply confusing, open to abuse and counter intuitive to the UK's ability to respond to the pandemic and indeed to recover going forward	+

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Appendix B – 83 (Minor) Issues (with 3 or less observations) & DAERA Comment

Issue No.	Observation	Raised By	DAERA Comment
<p>Household Waste Recycling Centres (HWRCs) & Fly-Tipping</p>			
<p>There were a total of 34 observations received in respect of HWRCs and Fly-Tipping collated into 13 separate issues, 10 of which received 3 or less observations from respondents. These 10 issues are outlined below including what sector(s) they originated and brief DAERA commentary around each issue.</p>			
1.	The lack of a consolidated approach from local Councils over the HWRC closures created confusion and anger among the general public.	+++++ +++	Issue brought forward and developed as Lesson No 1.
2.	There was lack of clarity in the Regulations, in particular around what constituted ‘essential travel’ and this caused a delay in re-opening the HWRC’s.	+++ +	Issue brought forward and developed as Lesson No 2.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
3.	The HWRCs should have offered a reduced service rather than closing completely.	++++ ++	Issue brought forward and developed as Lesson No 1.
4.	The closure of the HWRCs caused a range of issues during the lockdown. Stockpiling of waste was exacerbated with many people furloughed or working from home and more waste than usual being generated. There is an indication that this resulted in a significant increase in the number of fly-tipping incidents.	+	Please refer to Lesson No 1 contained in the main body of the report and also at Appendix C.
5.	A Ministerial announcement, backed by the Dept of Health and the Executive was required for the re-opening of the HWRCs to instil confidence in councils.	+	Please refer to Lesson No 2 contained in the main body of the report and also at Appendix C.
6.	Greater consistency required between central and local government with regard to interpretation of the Regulations e.g. Councils were left without guidance for a period of 1-2 weeks in relation to the HWRCs re-opening.	+++	Please refer to Lesson No 2 contained in the main body of the report and also at Appendix C.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
7.	The lack of a collaborative approach from Councils resulted in a very diverse delivery as the HWRCs re-opened.	+	Please refer to Lesson No 1 contained in the main body of the report and also at Appendix C.
8.	The re-opening of the HWRCs was very well received and without disruption.	+	Please refer to Lesson Nos 1 & 2 contained in the main body of the report and also at Appendix C.
9.	The whole HWRC issue could have been depoliticised had the position of the Minister been clarified much earlier.	+	The re-opening of HWRCs was well received by the general public however ideally this could have occurred in a more uniform and consistent manner. Please refer to Lesson Nos 1 & 2 contained in the main body of the report and also at Appendix C.

Issue No.	Observation	Raised By	DAERA Comment
10.	Misinformation and poor reporting standards on fly-tipping was used to force the re-opening of the HWRCs.	+	Increased levels of fly-tipping were reported throughout the period of HWRC closures however these embarked on a downward trend once a majority of HWRCs re-opened. It is also fair to assume that fly-tipping incidents which received widespread media coverage during lockdown did increase pressure on the HWRCs to re-open.
11.	There was an initial failure to engage with the PSNI regarding the re-opening of the HWRCs.	+	Meaningful consultation and discussion of key issues should have taken place with the PSNI in relation to the re-opening of HWRCs and this has been

Issue No.	Observation	Raised By	DAERA Comment
			recognised as important for the future.
12.	The closure of the HWRC's led to a (perceived) increase in fly-tipping which became the focus of political, media and public pressure.	+++	Incidents of fly-tipping did receive an elevated level of coverage throughout lockdown however we feel this can be mitigated in future by Lesson No 1.
13.	<p>Many Councils were unable to provide any data on fly tipping in the early stages of the pandemic while discrepancies in the reporting of fly-tipping also became apparent.</p> <p>SIB collected fly-tipping data from councils as part of the Municipal Waste Issues Tracker. Each Council has its own process of recording incidents in terms of scale and nature/type of waste. Given the inconsistency in reporting, the data provided could not be relied upon to make reliable comparisons, draw conclusions or allocate resources.</p>	+++	We recognise the difficulties that local councils and the wider waste sector were confronted with at the height of this pandemic. The Municipal Waste Tracker produced by SIB provided a daily picture of waste issues including fly-tipping. While differences in

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
			<p>the reporting of incidents of fly-tipping across councils did emerge during this period, this is an issue that can be positively developed for the future.</p> <p>Initial work has already commenced by SIB to support DAERA and Councils in developing an app which could be used to record fly-tipping incidents in a consistent manner across the board.</p> <p>The design of the app is presently being informed by four Councils and DAERA to ensure it is fit for purpose. Once developed, the app will undergo testing by</p>

Issue No.	Observation	Raised By	DAERA Comment
			<p>Councils and DAERA, with the intention of sharing with all 11 local councils for use, if successful. At present, SIB is in the process of agreeing the specification of the app for a developer to take forward.</p> <p>Please also refer to Lesson No 7 in the main body of the report or Appendix C for further details.</p>

Emergency Planning & Business Continuity Actions

There were a total of 39 observations received in respect of **Emergency Planning & Business Continuity Actions** collated into 23 separate issues, 22 of which received 3 or less observations from respondents. These 22 observations are outlined below including the sector(s) in which they originated and brief DAERA commentary around these.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
14.	The pandemic illustrated the importance of a robust contingency plan should a lockdown occur again. Any contingency plan must be a collective effort including all sectors.	++ ++	Issue brought forward and developed as Lesson No 3.
15.	The ‘Lessons Learned’ exercise will allow us to develop a stronger set of FAQs for responding to future shocks	+	We agree with this comment and this report is the outworking of the development of lessons learned.
16.	A database of key staff across EPD, NIEA and local Councils should be created, detailing contact details and job role and responsibilities. This should be reviewed annually.	+	The contact lists for the Government Waste Working Group and the Strategic Waste Partnership are the main contact points for EPD, NIEA and local councils. Any contacts required outside of this should be directed

Issue No.	Observation	Raised By	DAERA Comment
			through these main contact points.
17.	The existing NIEA database including contacts within local Councils and the wider waste sector facilitated a rapid assessment of what was happening on the ground.	+	As per above, the existing structures for collaboration and communication are an excellent starting point for all contacts.
18.	The publication of Regulatory Position Statements were timely and well-received by many stakeholders.	+++	Engagement with stakeholders across the sector has indicated the positive contribution of Regulatory Position Statements. This process will be utilised again in the future if required.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
19.	More detail should have been provided to all staff on the internal structures for the emergency response. This should have included individual and collective responsibilities and cross-Departmental interactions.	+	The Department’s MERP and the structures that were initiated by its implementation were relayed to all staff in a series of communications, including progress updates. The Department will however take this on board in developing future communications.
20.	The streamlining of the DOC process was positive and removed unnecessary layers of bureaucracy.	+	We will continue to examine the process of communication and streamline the process where possible to improve efficiency.

Issue No.	Observation	Raised By	DAERA Comment
21.	Local Council contingency plan(s) for a pandemic were not evident.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.
22.	NIEA paused their routine inspection programme during the pandemic however they maintained the capability to respond to incidents where there was risk to human health or the environment.	+	This approach proved successful and allowed NIEA to deal with serious incidents while still providing protection to staff and the wider public. The learning generated from these procedures can be employed again in the event of a future emergency response.
23.	There was considerable confusion to begin with in respect of operational matters. During this period, contractors were approached verbally on operational issues	++	We recognise that during the unprecedented times we faced that there was inevitably

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	without any regard for existing contractual arrangements or possible future financial consequences.		confusion. However, the collaboration employed by all parties addressed this and we recognise the need for immediate engagement in the future to ensure an improved response.
24.	Key DAERA staff leading work streams delivered timely outputs.	+ ++	We thank the respondents for this observation.
25.	There was an evident lack of preparatory emergency planning at Group and Departmental level.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.
26.	There appears to be a lack of legislative means to take emergency action to deal with waste going to landfill.	+	The application of the waste hierarchy is important. Whilst we

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
			<p>recognise that the situation of potentially recyclable waste going to landfill arose due to the pandemic we will continue to examine how to minimise waste to landfill in future.</p>
27.	<p>The domestic kerbside collection system experienced issues in some areas raising questions over how adaptive and responsive these services are.</p>	<p>+ ++</p>	<p>We recognise that there was some disruption to kerbside services in the very early days of lockdown, however given the scale of the crisis, there was minimal relative service disruption overall. We would stress the importance of early engagement from all parties if a future emergency arises so</p>

Issue No.	Observation	Raised By	DAERA Comment
			solutions can be formulated at the earliest possible opportunity.
28.	There was a lack of advance notice of operational decisions which made it difficult to prepare for or manage.	++ +	As per above we would highlight the importance of engagement between all parties at the earliest opportunity.
29.	An initial shortage of drivers for bin lorries caused problems.	+ ++	The Driver/Mechanic Volunteer scheme was developed to mitigate the impact of this and can be used in future if required.
30.	DAERA were aware that Covid-19 was an issue in February 2020 however it was w/c 16 March 2020 before work was initiated. The warning signs were there and the Department should have been better prepared.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
31.	The Driver/Mechanic Volunteer scheme was set up to provide support to Councils impacted by Covid-19. The scheme was a good example of private sector drivers working closely with the public sector for the good of society. A significant amount of work went into developing the scheme however by the time the scheme 'went live' a lot of furloughed drivers had returned to work, which meant that the full potential of the scheme was not realised.	+ +	This is another example of the benefits of central and local government working collaboratively. This particular scheme has now been fully developed and can be used in future if necessary.
32.	There appeared to be a lack of contingency planning by 3 rd party contractors in the waste sector.	++	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.
33.	The full potential benefits of using GIS were not realised during the pandemic. This is an area that should be developed further, particularly for DAERA/NIEA, as	+	We recognise the important role GIS can play.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	it allows for a more professional approach to data presentation and a streamlined way to deal with issues/queries.		
34.	A degree of panic set in where decision-making and planning was reactive rather than utilising and trusting internal processes already developed.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.
35.	The Business Continuity Plan (BCP) was not referred to throughout the pandemic, indicating that it was probably not fit for purpose. We must ensure that continuity plans are relevant, compliant, regularly tested and fit to be implemented when required.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.

Issue No.	Observation	Raised By	DAERA Comment
36.	All aspects of the business were fully risk-assessed at the beginning of the pandemic, ensuring the safety of our staff was paramount while continuing to service key infrastructure. We examined our business resources to examine diversification into other key and critical areas. Although not implemented this time it can be used in future if necessary.	+	Please refer to Lesson No 3 contained in the main body of the report and also at Appendix C.
Working Groups & Partnerships			
<p>Working Groups & Partnerships received 74 observations collated into 21 separate issues, 14 of which received 3 or less observations from respondents. These 14 issues are outlined below including which sector(s) they originated and a commentary around these.</p>			
37.	The desire by local and central government to work together to develop solutions was very positive, as was the public visibility of this collaboration.	+	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
38.	The Municipal Waste Tracker records a council's assessment of their ability to cope however we need to establish if this is based on a common set of criteria across all councils.	+	The tracker was developed as a part of the response to the pandemic. It evolved and improved as the situation developed. We recognise that it may require some refinement and standardisation but will remain as a useful tool in a future emergency response. Please also refer to Lesson No 7 contained in the main body of the report and also at Appendix C.
39.	The Municipal Waste Tracker was used very effectively during the Covid-19 crisis to report to the most senior levels within Central and Local Government. The MWT provided a real time view while also showing emerging trends over a number of weeks. Using the RAG reporting system, it was possible to identify where the	++ +	We thank the respondents for the recognition of the valuable role of the tracker. Please refer to Lesson No 7 contained in the main body

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	greatest pressures were in the supply chain and it became a central repository for all the key information in relation to MSW.		of the report and also at Appendix C.
40.	The Strategic Working Groups were a valuable tool, increasing communication and understanding between government, councils and the wider waste sector. Harnessing & building on existing contact mechanisms such as SWP & GWWG has proved invaluable, increasing efficiency in communications and allowing the early identification of emerging issues. Relationships have been developed and strengthened and this will prove a lasting benefit.	+++++ ++++ +++++ ++	Issue brought forward and developed as Lesson No 4.
41.	There was good collaboration between EPD & NIEA with consistent, regular engagement throughout the pandemic, harnessed by the establishment of the Covid Waste Management Group. This worked well, with clear objective and direction and it is important to reflect on the positive aspects of our contingency planning.	+++++ +++	Issue brought forward to be developed as Lesson No 4.

Issue No.	Observation	Raised By	DAERA Comment
42.	In the main there was good collaboration and a drive for consistency among the 11 local councils. This enabled the streamlining of working models and systems and the prioritisation of key issues. This work was supported by the strategic working groups and regular meetings.	+	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.
43.	The 4 Nations meetings were valuable for information sharing and learning from each other	++	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.
44.	The ability to assess and understand issues quickly allowed informed briefings to be provided to Gold Command and CCG(NI).	+	DAERA thanks the respondent for this observation.
45.	There must be clear direction to councils that all dealings with waste should go to the lead department i.e. DAERA in the first place. This feeds into the related point that not all councils were brought into GWWG representation from the outset, as illustrated when BCC announced they were stopping blue & brown bin collections.	++	We recognise that this was an unprecedented time but it is important for all councils to escalate issues through regular engagement via the various

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	Opinions from individual councils require a platform however there appears to be no collective voice.		established working groups. This will ensure an established awareness among all of the parties of the role, responsibilities and remit of each other. This will also ensure there is a platform for all areas across the sector to have a forum and input.
46.	The establishment of the waste sector group, chaired by NIEA/EMFG G3s, was very positive and provided the sector with the opportunity to highlight issues directly to top DAERA management.	+++ +++	Issue brought forward and developed as Lesson No 4.
47.	The structures put in place did not include all stakeholders.	++++ ++	Issue brought forward and developed as Lesson No 5.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
48.	DAERA engaging with industry directly runs the risk of policy drift or creating a hierarchy of groups/individuals within the waste industry.	+	Please refer to Lesson No 5 contained in the main body of the report and also at Appendix C.
49.	There appeared to be significant duplication in meetings which seemed to mirror the normal arrangements for waste but at an enhanced frequency.	++ ++	Issue brought forward and developed as Lesson No 6.
50.	Perception of too much information from lots of sources, and that the information being shared wasn't necessarily coherent or correct. A small working group of those with applicable skills could have led to quicker decision making – would allow clear messaging and give responsibility to an agency to deliver for example "NIEA in conjunction with CIWM state".	+	We recognise that there were gaps in information sharing from all parties but through the response to the pandemic the collaboration between all parties has increased, which in turn should lead to better, clearer and more consistent messages. We will continue to examine the

Issue No.	Observation	Raised By	DAERA Comment
			<p>process of communicating key messages and streamline the process in order to improve efficiency where possible.</p>
51.	<p>Dealing with a range of individuals at different levels around the same issue was frustrating. The process became over-complicated and lead to mixed messages, particularly in dealing with contractors.</p>	<p>+++ ++++</p>	<p>Issue brought forward and developed as Lesson No 6.</p>
52.	<p>CCGNI exacerbated issues rather than working towards solutions</p>	<p>+</p>	<p>This observation has been noted, we recognise that all of the various collaborative groups will be perceived as having both positive and negative impacts. We do also however recognise the importance of the Civil Contingencies Group, Northern</p>

Issue No.	Observation	Raised By	DAERA Comment
			Ireland and its role in civil protection policy and emergency response.
53.	DOC queries were not dealt with in a timely manner by other Departments	+	We recognise the pressure all Departments were under but prompt and mutually beneficial cross-departmental co-operation is essential.
54.	The insistence on micromanagement and centralised decision-making has the potential to cause severe inertia to be responsive to problems	+	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.

Issue No.	Observation	Raised By	DAERA Comment
55.	There was significant time spent on engagement with individual councils and private waste companies during the initial stage of restrictions to provide reassurance.	++	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.
56.	Good, agile and adaptive communications was delivered to external stakeholders, in particular the use of existing partnerships and structures, such as NICAP	+	Please refer to Lesson No 4 contained in the main body of the report and also at Appendix C.
57.	<p>The important role of SIB particularly with the formulation and continual development of the Municipal Waste Tracker was extremely beneficial. The significant value of metrics via the waste tracker in communications, allowing us to provide, accurate timely updates for DOC/MERP/senior management and 4 Nations.</p> <p>In addition, although the SIB waste sector support scheme may not have been used, the scheme is now in place and ready for use in future if required.</p>	<p>+++++</p> <p>++</p> <p>+</p>	Issue brought forward and developed as Lesson No 7.

Issue No.	Observation	Raised By	DAERA Comment
Communications			
<p>Communications received 16 observations collated into 9 separate issues, 8 of which received 3 or less observations from respondents. These 8 issues are outlined below including what sector(s) they originated and a commentary around these.</p>			
58.	<p>From quite an early stage in the crisis, the lines of communication and reporting worked really well and were streamlined. DAERA set who was responsible for what within its reporting lines. There was a slightly delayed reaction from Local Government in the early weeks of the pandemic and it was initially unclear who the main points of contact were.</p>	+	<p>DAERA, in collaboration with key stakeholders in local government, sought open communication to deliver consistent and clear messages around emerging issues in order to maintain essential services throughout. We appreciate there were some issues in the early weeks of the pandemic but these were resolved quickly and the communication</p>

Issue No.	Observation	Raised By	DAERA Comment
			channels established can be quickly reactivated as required.
59.	Council engaged the public largely through a social media campaign and public support was very positive.	++	We recognise the importance of social media messaging but would highlight that the council also collaboratively developed messaging for radio and a householder leaflet to ensure messaging was delivered to all citizens of Northern Ireland.
60.	Communication throughout the pandemic was excellent from NIEA	+	DAERA, and NIEA in particular, appreciate this input and will continue to provide timely and accurate messaging

Issue No.	Observation	Raised By	DAERA Comment
61.	DAERA Minister was engaged on all of the waste aspects throughout the pandemic while communications were simple, coherent and consistent	++++	Issue brought forward to be developed as Lesson No 8.
62.	Overall, communication was very good with clear, concise information with a regional approach	++	We agree that as this was a Northern Ireland-wide challenge it was best dealt with by a collective approach. The positive observations received around communications endorses the collaborative approach to providing simple, coherent messaging around key issues in a timely manner using the most effective platforms available.

Issue No.	Observation	Raised By	DAERA Comment
63.	The Minister was engaged with waste issues during the pandemic but it is worth noting for future that this intensifies the focus from the public, media and political quarters.	+	We recognise that having the Minister engaged will often bring additional scrutiny and attention however this level of engagement should be viewed positively as it can contribute to the swift resolution of issues.
64.	In regard to local Councils a central co-ordinating officer for Comms was very beneficial	+ + +	We have learned the benefit of using dedicated communications contacts and will employ this in future.
65.	The visit to a private waste sector site was a very positive move, showing government visibility and leadership and providing a morale boost and reassurance to workers in the waste industry.	+	We note this observation and thank the respondent.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
66.	There was continual messaging with Councils particularly in the early days of the restrictions around the need for them to maintain kerbside collections	+	We recognise that a high level of frequent engagement and collaboration between stakeholders, accompanied by consistent messaging, was key in maintaining essential services. Maintaining kerbside collections is vital for protecting the environment, public health and the economy.
Waste Sector & Recyclate Markets			
Waste Sector & Recyclate Markets received 46 observations collated into 17 separate issues, 13 of which received 3 or less observations from respondents. These 13 issues are outlined below including the sector(s) from which they originated and a commentary around these.			

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
67.	Understanding the importance of mitigating the impact of the pandemic on the whole supply chain. – e.g. HWRCs, collectors, recycle processors, export markets, manufacturers.	+	We recognise the importance of waste collections on the supply chain and delivered a number of messages on the subject throughout the pandemic to heighten public awareness.
68.	The pandemic and lockdown has presented an opportunity for Councils involved in the contract with Bryson House to develop relationships and progress the introduction of the kerb sort box system and establish a more stable recycling platform going forward.	+	We welcome any development and strengthening of relationships brought about by the pandemic.
69.	The fragility of the local recycle market has been exposed throughout the pandemic. The global nature of the crisis illustrated that in normal times, the local recycling industry can operate within the global commodity markets - trading paper, plastic, textiles, RDF, etc. competing against virgin materials and other countries recycling. However when demand falls, the continuous production of	++	Please refer to Lesson No 9 contained in the main body of the report and also at Appendix C.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	<p>waste cannot be paused in the way that the production of virgin materials can be. In the global commodity market, NI is not a major player and if Government wants to encourage more local reprocessing it needs to be recognised that it will be moving away from a model of combined economic & environmental sustainability, towards a model of subsidised industry that is not sustainable in its own right. Government need to recognise the long term financial burden that will accompany a local reprocessing model.</p>		
70.	<p>The lack of a robust local recycle industry presents an opportunity to examine how the recycle industry here can support green growth, the circular economy and more local markets in future.</p>	<p>+++ +++</p>	<p>Issue brought forward and developed as Lesson No 9.</p>
71.	<p>The systems for managing waste coped well at the height of the pandemic, with Councils and processors maintaining frontline services and recycling/disposal outlets continuing to function. In relation to markets for recycling e.g. textiles an over-reliance on a small number of processors and end markets in other countries has had, and will continue, to have profound impacts.</p>	<p>+</p>	<p>We recognise the need to build a more resilient local circular economy and are investigating opportunities in collaboration with the public and private sector.</p>

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
72.	Information regarding the skill base of local companies within the sector was not readily available. Having this information to hand may have helped formulate a more rapid and robust response. A comprehensive, well maintained directory or database would prove very beneficial for NIEA/EMFG in future.	+	During the pandemic, much closer links have been developed with the private waste sector and the engagement with the sector shall continue which will enable a more rapid and robust response in future.
73.	Waste services being classed as an essential service and waste workers being recognised as key workers was an important step in maintaining waste services, notably with local councils. The public acknowledgement of this by the DAERA Minister was also significant and provided a timely morale boost.	+++++ ++++ ++	Issue brought forward and developed as Lesson No 10.
74.	Waste workers and waste services should have been deemed an essential service immediately and should not have taken as long as it did. Waste companies were using multiple letters from essential clients however a permit issued and regulated	+	The waste sector and the frontline workers working within the sector ensured services continued throughout the pandemic, whilst

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
	<p>by NIEA from the beginning would have worked much better. This would also have prevented the need for other agencies issuing such letters.</p>		<p>protecting public health and the environment. We publicly recognised the essential status of waste services and workers in the industry in the very early stages of the crisis. The public recognition of this by Minister Poots in April illustrated our acute awareness of the essential nature of the sector.</p>
75.	<p>There was a distinct lack of knowledge and understanding of the local and national market and therefore this was not fully recognised or harnessed during the pandemic</p>	<p>+++ ++++</p>	<p>Issue brought forward to be developed as Lesson No 9.</p>

Issue No.	Observation	Raised By	DAERA Comment
76.	There was little understanding of business support available to the wider waste sector which only served to increase the perceived waste sector isolation from core Invest NI support and engagement tools.	+	A wide range of support measures were implemented to mitigate the negative financial impact of the pandemic. The majority of the business support was not sector specific and as such it was for each business to ascertain what support they were entitled to.
77.	There appears to be no central organisation to represent waste sector in NI. Does Recycle NI fulfil this function and if so, were they utilised and engaged sufficiently as a representative organisation?	+	We recognise the need for a representative body with the widest possible membership in the waste sector. During the pandemic key stakeholders from across the waste sector were engaged throughout. DAERA will continue with this engagement and actively seek to broaden the

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
			scope of this engagement in future. Please also refer to Lesson No 5 in the main body of the report and at Appendix C.
78.	There is a (perceived) distrust between the private waste sector and local councils i.e. competitive versus collaborative	+	We would urge close collaboration between all stakeholders.
79.	The pandemic showed that many council contracts are lacking the flexibility to adjust to a crisis – such as diversion from landfill	+	While individual councils have responsibility for their contracts, DAERA would highlight the importance of building appropriate flexibility into council operations to maximise environmental benefit.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
80.	Shared resources could be looked at by councils if current contractors are unable to meet demand in the short term however this could prove difficult with a private sector waste industry in NI.	+	As per comments for Issue 79 above.
81.	Councils had limited control over access to treatment facilities	+++	<p>DAERA do not have any influence in this area and, ultimately, this is an issue for the councils affected. We would suggest this is investigated further by the affected councils with the aim of reaching a satisfactory resolution.</p> <p>.</p>

Issue No.	Observation	Raised By	DAERA Comment
82.	The pandemic highlighted the over-reliance on 3 rd party contractors within the waste industry with commercial operators looking after their own interests rather than focussing on service provision.	+++	We fully appreciate that commercial operators will have a focus on having a profitable business but would highlight the need for councils to strike the right balance between use of commercial operators and using their in-house services for effective service provision.
83.	The positive public reaction and support for waste industry staff was well received and provided a timely boost.	+++ +	Issue brought forward and developed as Lesson No 10.

Issue No.	Observation	Raised By	DAERA Comment
Supply Chain & Procurement			
<p>Supply Chain & Procurement received 13 observations collated into 5 separate issues, 3 of which received 3 or less observations from respondents. These 3 issues are outlined below including which sector(s) they originated and a response to these issues.</p>			
84.	<p>A shortage of PPE, guidance regarding the use of PPE and wider H&S issues was a problem for some Councils. Common areas included social distancing measures, guidance around vehicles & crews and the sanitising of vehicles. Consistency of approach was not apparent across all Councils.</p>	<p>++ +++</p>	<p>Issue brought forward and developed as Lesson No 11.</p>
85.	<p>A collaborative NI/Entire Local Council-led bulk procurement of PPE would have provided a better approach</p>	<p>++++</p>	<p>Issue brought forward and developed as Lesson No 11.</p>
86.	<p>Thorough risk assessment and contingency planning ensured essential PPE was adequately stocked.</p>	<p>+</p>	<p>Please refer to Lesson Nos 3 & 11 contained in the main body of the report and also at Appendix C.</p>

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
87.	Frequently examining supplier resilience and monitoring the supply chain was vital and ensured our ability to source material even in the emergency situation.	+	Please refer to Lesson No 11 contained in the main body of the report and also at Appendix C.
88.	Consideration should now be given to the centralisation of guidance and operational practices from Councils	++	We would welcome a more centralised approach to guidance and operational practices at a council level and we would be open to working with the councils to deliver this.

Finance

Finance received 8 observations collated into 6 separate issues, all of which received 3 or less observations from respondents. These 8 issues are outlined below including which sector(s) they originated and a response around these.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
89.	There was significant confusion around finance, particularly additional Covid related funding, and which Department was responsible. This needs to be addressed for any future 'Major Emergency' in terms of lead roles etc.	++	We accept that there was some confusion around Covid-related funding initially but this was resolved in collaboration with all of our affected stakeholders and there is now a robust process for any similar future emergency funding.
90.	Clarity is required re lead roles and responsibilities rg DAERA and DfC re finance bid.	+	See comment to Issue 89.
91.	There was a lack of direction from DoF on Covid financial assistance to provide support to Councils	+	See comment to Issue 89.
92.	The pandemic exposed the fact that the external Council spend is to the detriment of internal investment.	+	We recognise that spending will always have to be prioritised but

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
			this prioritisation would be for each Council to decide upon.
93.	It is clear now that Councils should be exploring possible new revenue streams for waste eg bulky waste collections, charging contractors for using HWRCs etc	+ +	Decisions on possible charging for services, outside of what a council is legally obliged to provide for free, would be a matter for each individual council.
94.	Financial assistance has been sought from NIEA in the form of a subsistence fee reduction or deferral and it is hoped this is still being considered. While some private waste companies (largely those servicing the domestic market) are thriving, others (servicing commercial and industrial sectors) are suffering.	+	The issue of a reduction or deferral of fees was considered by NIEA and while the issue of invoices for payment was postponed for a short time, there is no plan to reduce or defer fees.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
Staff			
<p>Staff received 9 observations collated into 6 separate issues, 5 of which received 3 or less observations from respondents. These 5 issues are outlined below including the sector(s) which they originated and a comment around these.</p>			
95.	There was strong leadership and direction from senior management during the crisis, including elected representatives and this motivated staff on the ground.	+	<p>DAERA thanks the respondent for this observation and recognises the leadership shown by officials and elected representatives across Northern Ireland.</p>

Issue No.	Observation	Raised By	DAERA Comment
96.	There are concerns that SIB was pulled into operations in a manner which is not sustainable, or that could lead to potentially unrealistic expectations of their future role for some in local government.	+	The Strategic Investment Board have illustrated their flexibility in utilising their limited resources to best effect during unprecedented times. We fully recognise that the level of input they provided in this area would not be sustainable long term and would highlight this to all within local government.
97.	There was a lack of Departmental engagement with waste sector TUS	+	DAERA engaged with a wide range of stakeholders throughout the pandemic including TUS and health and safety representative bodies, but we do accept engagement could always be improved.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
98.	The pandemic illustrated the resilience of Council staff & TUS and their support for Councils efforts to keep services going	+	We fully recognise and appreciate the resilience of council staff and TUS.
99.	There is a clear lack of experience and training on capturing observations for lessons for future emergency situations.	+	Observation has been noted. This ‘Lessons Learned’ exercise, while in no way definitive, allows for a collective reflection of actions throughout the pandemic while developing valuable lessons which will influence our response in future situations.
100.	Initial projections regarding the impact of Covid 19 was flawed and this skewed modelling and decision-making around staffing as the crisis progressed.	++++	Issue brought forward and developed as Lesson No 3.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
Agile Working			
Agile Working received 9 observations collated into 2 separate issues, none of which received 3 or less observations			
101.	The pandemic has now given way to an opportunity to fully embrace and incorporate new working practices	+++ ++	Issue brought forward and developed as Lesson No 12.
102.	Using & embracing all available technology allowed agile working with minimal disruption	++ ++	Issue brought forward and developed as Lesson No 12.

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
Other			
Other received 2 observations which formed 2 separate issues with both issues receiving 3 or less observations from respondents. These 2 issues are outlined below including what sector(s) they originated and a response around these.			
103.	A greater number of community litter picks occurred owing to an apparent increase in civic pride and this is something that should be harnessed now.	+	We thank the respondent for this observation and we welcome all measures which help to tackle litter. We recognise that littering is still a major issue which we will continue to tackle.
104.	Having a devolved approach to guidance is simply confusing, open to abuse and counter intuitive to the UK’s ability to respond to the pandemic and indeed to recover going forward	+	Decisions on devolved matters are for each Devolved Administration to make however there was frequent engagement and collaboration between all four

+ DAERA Observation + Local Government/Council Observation + Waste Sector Observation + Other Observation

Issue No.	Observation	Raised By	DAERA Comment
			<p>nations throughout the pandemic to ensure a consistent approach where possible.</p>

Appendix C – Lessons Learned – Quick Reference

Summary of Lessons Learned for Future Resilience

Household Waste Recycling Centres (HWRCs) & Fly-Tipping

Lesson No 1

Lesson No 1 – The closure of Household Waste Recycling Centres (HWRCs) put a strain on waste management resources and generated a level of disquiet among the general public. The future aim must be to maintain services at HWRCs even on a restricted capacity, taking into account the availability of resources.

Lesson No 2

Lesson No 2 - HWRCs were not specifically listed as an operation or activity to close by the Health Protection (Coronavirus, Restrictions) Regulations (Northern Ireland) 2020 and therefore a complete closure was not required. Article 25 of the Waste and Contaminated Land (Northern Ireland) Order 1997 requires local councils to provide “places at which persons may deposit their household waste at all reasonable times free of charge”. ‘Essential travel’ should not have been an issue for debate around closure of the HWRCs and sites should have remained open (even on a reduced service) and the public make the judgement on whether their travel was ‘essential’.

Summary of Lessons Learned for Future Resilience

However DAERA recognise that some councils were not content with the initial lack of clarity within the Regulations on whether travel to HWRCs was permitted. Many councils engaged legal advice with regard to re-opening HWRCs in their area and conflicting legal advice resulted in some councils adopting different positions. On 14 May 2020 it was announced that HWRCs fell within the scope of '*critical public services*', as outlined in regulation 5(2)(i), thereby permitting travel to HWRCs and removing any lack of clarity in the Regulations.

The lesson has been learned that HWRCs provide an essential service and that every effort should be made in future to maintain services at all HWRC sites in line with Lesson 1 in the event of any future emergency and this should be made clear in any future emergency Regulations or guidance.

Emergency Planning & Business Continuity Actions

Lesson No 3

Lesson No 3 - The importance of robust contingency and continuity planning in mitigating the impact of major shocks has been acutely highlighted during the pandemic. The *Building Waste Sector Resilience* report can sit alongside the NIEA Contingency Plan and be used in future to support the Department's Major Emergency Response Plan (MERP) in respect of contingency support for waste services. Central and Local Government must continue to work collaboratively to

Summary of Lessons Learned for Future Resilience

develop dynamic contingency plans, capable of coping with various emergency scenarios while maintaining essential services.

Working Groups & Partnerships**Lesson No 4**

Lesson No 4 – We recognise the value of the collaboration via the various working groups and this should continue (albeit at a reduced frequency in non-emergency times). The chairmanship for each of these groups will ensure that participant lists are current and appropriate and, in the event of a future emergency, these groups should all be prepared to increase the frequency of meetings as required.

Lesson No 5

Lesson No 5 – DAERA are committed to engaging with a wide range of stakeholders however working groups will always require a limit to participation to remain feasible and productive. Representation from across central and local government, NIEA, representative bodies and other organisations and groups across the waste sector can ensure that all sectors have a voice and the work of the groups remains collaborative and wholly representative. As with Lesson No 4, the chairmanship of each of these groups will ensure that participant lists are current and appropriate.

Summary of Lessons Learned for Future Resilience**Lesson No 6**

Lesson No 6 - The gravity and evolving nature of the pandemic meant that command structures and groups met at an enhanced frequency and it was almost inevitable that some level of duplication would occur. Establishing central points of contact (and an alternative) for particular key issues may be a way of mitigating areas of duplication in future.

DAERA, in collaboration with key stakeholders in local government, sought open communication to deliver consistent and clear messages around emerging issues in order to maintain essential services and these communication channels can be quickly reactivated if required.

Please also refer to the wider commentary around Communications in Appendix B also.

Lesson No 7

Lesson No 7 – SIB played an important role for waste services throughout the pandemic, developing the Municipal Waste Tracker (MWT), the Driver/Mechanic Volunteer Scheme and more recently a Fly-tipping App, which is discussed in greater detail in Appendix B. The infrastructure for all of these tools remains in place for future use if required. While recognising that SIB do not have infinite resources, their services and the tools developed by them should be employed in the event of future emergency situations where required.

Please also see Issue 13 in Appendix B.

Summary of Lessons Learned for Future Resilience**Communications****Lesson No 8**

Lesson No 8 - The acknowledgement of waste workers as essential key workers, Protect & Respect, Keep Recycling, Fly-Tipping & Littering, Bin Hygiene & PPE Littering were just some of the key messages the Minister delivered personally on social media, indicating his level of engagement on waste matters.

The collaborative approach to communications between DAERA, local councils and other stakeholders across the sector ensured key issues, and messages around these issues, received consistently high levels of exposure throughout critical periods and illustrates the importance of having the Minister engaged also.

Waste Sector & Recyclate Markets**Lesson No 9**

Lesson No 9 – Throughout the pandemic DAERA received regular updates via WRAP providing the most current information in respect of the national recyclate industry, while local engagement was maintained via the Private Waste

Summary of Lessons Learned for Future Resilience

Sector Group and a national UK perspective ascertained through weekly meetings with DEFRA. This engagement ensured DAERA had an informed view of the market throughout the pandemic and this approach should continue in future. The pandemic has made it clear that there is a need for a strong, local circular economy and the development of the Circular Economy Strategic Framework and the Green Growth Strategy will take this lesson forward.

Lesson No 10

Lesson No 10 – The pandemic has shown clearly that waste services are an essential service and should always be recognised as such in future. We must continue to promote the key message of ‘Protect & Respect’ for waste workers across the industry.

Supply Chain & Procurement**Lesson No 11**

Lesson No 11 – A uniform or ‘one size fits all’ approach across all local councils is maybe implausible given the diverse, and quite often unique, range of challenges facing individual councils at any particular time. Nevertheless, as with Lesson

Summary of Lessons Learned for Future Resilience

No 3, Central and Local Government should continue to work collaboratively to develop dynamic contingency plans which can mitigate such pressures in future.

Agile Working**[Lesson No 12](#)**

Lesson No 12 – Our response to the pandemic has demonstrated that a much greater opportunity existed to work from home than was recognised before the onset of COVID-19. It is important that people have the opportunity to return to their place of work, where it is possible to do that safely, however DAERA recognise the opportunities that now exist for agile working in many roles and the significant benefits associated with that but we also recognise that not all roles can be carried out remotely.

Glossary of Terms

CCG (NI) – Civil Contingencies Group (Northern Ireland)

DA – Devolved Administration

DAERA – Department of Agriculture, Environment & Rural Affairs

DEFRA – Department for Environment, Food & Rural Affairs

DOC – Departmental Operational Centre

EMFG – Environment, Marine & Fisheries Group

EPD – Environmental Policy Division

GWWG – Government Waste Working Group

HWRC – Household Waste Recycling Centre

KNIB – Keep Northern Ireland Beautiful

MERP – Major Emergency Response Plan

MUDC - Mid Ulster District Council

MWT – Municipal Waste Tracker

NIEA – Northern Ireland Environment Agency

NCAP – National Communications Advisory Panel

PPE – Personal Protective Equipment

PRN – Packaging Recovery Note

SIB – Strategic Investment Board

SITREP – Situational Report

SOLACE – Society of Local Authority Chief Executives

SWP – Strategic Waste Partnership

WRAP - Waste & Resources Action Programme