



CABINET - 5TH APRIL 2023

SUBJECT: WASTE AND RECYCLING STRATEGY

REPORT BY: CHIEF EXECUTIVE

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1. PURPOSE OF REPORT

- 1.1 To seek Cabinet approval for the Authority's draft Waste and Recycling Strategy 2023-2028.
- 1.2 To seek approval to undertake a 6 week public consultation on the proposed strategy and the associated service change options.

2. SUMMARY

- 2.1 Members are fully aware of the changes to our climate. Both UK and Welsh Government have set challenging climate change targets and the Council too has declared its own Climate emergency. The need to adapt our behaviours and practices both individually, organisationally and collectively is well rehearsed through these policy positions.
- 2.2 Set within this wider environmental context the Welsh Government have set an overall zero waste target by 2050 and challenging recycling targets for Councils. The current statutory target of 64% is already in place and a further 70% recycling target by 24/25. The Council's recycling performance is currently at 59% well below the levels required to achieve the statutory targets set by Welsh Government. This means that the Authority is at considerable risk of facing significant fines for not achieving the required performance targets. Presently, Caerphilly has the highest level of residual waste per person in Wales and a recent study of our waste arisings confirm that almost half of the contents of our residual waste (refuse) bin contains recyclable material. Dialogue with the Minister for Climate Change and senior officials in Welsh Government has led to a request for the Authority to submit a Waste & Recycling Strategy which is a document demonstrating how the Council and its residents are going to work differently to improve our performance. The proposed strategy document contains a wide range of measures focussing upon the waste hierarchy of Reduce, Reuse and Recycle.
- 2.3 The Council's proposed Waste and Recycling Strategy – "To 70% and beyond" (Appendix 1) sets out the significant changes we are looking to implement in order to meet the Welsh Government statutory recycling targets of 70% and beyond, with an overall aspiration to attain the higher level recovery targets and become an exemplar

local authority in the recycling sector.

2.4 The strategy focuses upon three key elements of interventions:

1. Diverting more recyclable materials from the residual waste stream.
2. Expanding recycling collection through new segregation streams, to ensure more material is collected and is of a higher quality.
3. Improving the performance, offer and overall resident experience at our household waste recycling centres (HWRCs).

3. RECOMMENDATIONS

3.1 To consider and approve the proposed draft Waste and Recycling Strategy for public consultation.

3.2 A further report is presented to Cabinet following the public consultation.

3.3 That Environment and Sustainability Scrutiny Committee is asked to establish a Task and Finish group to help develop the necessary policies and procedures to support the waste strategy.

4. REASONS FOR THE RECOMMENDATIONS

4.1 To ensure Caerphilly is able to achieve the required Welsh Government statutory recycling target of 70% in 2024/25.

4.2 To ensure Caerphilly is best placed to move beyond the required 2024/25 recycling target of 70% in subsequent years and be best placed to work towards the zero waste 2050 Welsh Government aspiration.

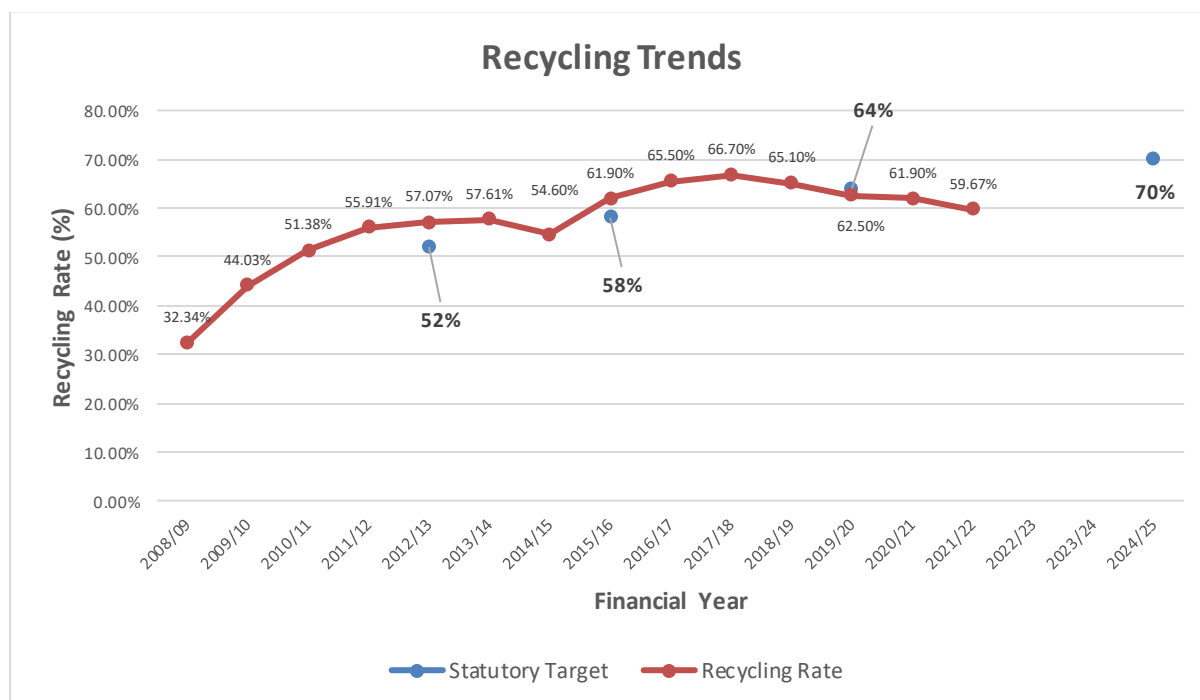
4.3 If no improvement is made in recycling performance the authority could be subject to Welsh Government infraction penalties of around £2M for not meeting statutory recycling performance targets.

5. THE REPORT

- 5.1 The Welsh National Waste Strategy, Towards Zero Waste was launched on 21 June 2010. The strategy set out a series of challenging statutory recycling targets for Local Authorities to deliver. These are as outlined below:

	2010/12	12/13	15/16	19/20	24/25
Min. levels of reuse & recycling/composting (or AD)	40%	52%	58%	64%	70%
Min. proportion of reuse/recycling/composting from source separation*	80%	80%	80%	80%	80%
Max. level of landfill	-	-	-	10%	5%
Max. level of energy from waste	-	-	42%	36%	30%
Min. levels of preparing for reuse (excluding Waste Electrical and Electronic Equipment (WEEE))	-	0.4%	0.6%	0.8%	1.0%

- 5.2 Caerphilly's recycling performance is outlined below alongside the Welsh Government statutory targets. As Graph 1 illustrates, Caerphilly has historically performed well against Welsh Government targets however, over the last 3 years recycling performance has declined. Performance for 2019/20 of 62.51%, 2020/21 of 61.90%, and 2021/22 of 59% all fell below the statutory target of 64%.



- 5.3 Through the Waste (Wales) Measure 2010, the Welsh Government (WG) made recycling targets from 2012-13 and beyond, statutory targets. This status allows Welsh Government to levy financial penalties against Council's that fail to achieve them. The statutory targets are weight based and have increased gradually over time. In the current national Welsh Government waste strategy "Beyond Recycling - A Strategy to make the Circular Economy in Wales a reality", the Welsh Government has stated they will work with Local Authorities and other key partners to develop further future recycling targets in line with their pathway to zero waste, with the ultimate aim of achieving 100% recycling by 2050. Welsh Government indicate that they will put in place further minimum statutory recycling targets for Local Authorities beyond 2025, potentially at a level of 80% by 2033.
- 5.4 It is clear, that in order to meet the current recycling statutory targets and those in future, we must change our current approach. In order for Caerphilly to achieve the required recycling performance a number of changes to service provision is needed, alongside a comprehensive and tailored approach to communication and engagement in order to assist behavioural change.
- 5.5 It has been identified that this can be addressed with a phased approach with the more immediate short term quick wins being proposed to be delivered during Autumn 2023.

Phase 1 – Autumn 2023

a) Service enhancements at the Household Waste Recycling Centres (HWRC'S)

Proposal - Appointment service to facilitate access to the HWRC services

- 5.5.1 This initial proposed service change involves the introduction of an appointment service in order for residents to access the network of Household Waste Recycling Centres (HWRC's). The Authority presently operates 6 sites 363 days of the year (noting that most of our neighbouring Authorities provide only 1 or 2 sites).
- 5.5.2 An appointment service for residents to access HWRC's is in place at Council areas across the country and offers a range of benefits, including a personally allocated time slot and safe space for a resident to drop off their waste and recyclable materials without the need to queue.
- 5.5.3 It also allows for site attendants to be prepared to offer individual support with advice, guidance and assistance with sorting and offloading.
- 5.5.4 An appointment service helps to reduce traffic build ups as presently the sites are susceptible to congestion at peak times of the week and busy parts of the respective seasons.
- 5.5.5 In short the appointment service creates a safer place for both residents to drop off and staff to work and operate machinery. The sites would have a controlled flow of users and this helps with planning movements of skips and containers from sites to the various recovery facilities and final disposal outlets.
- 5.5.6 Moreover, an appointment system will undoubtedly help control the levels of misuse we are presently experiencing from people living outside our County Borough which is likely to increase as neighbouring Councils further tighten their policies around refuse collection. It will also greatly assist with the redirection of significant amounts of builders and rogue trader waste that is still entering our HWRC sites despite our best

endeavours to stop this particular practice.

Proposal – Pre-sort all waste at the HWRC's

- 5.5.7 In order to improve our performance we recognise that we have to reconfigure the layout of our HWRC sites to make it easier to recycle and not so easy to simply throw everything into the general waste skip. It is proposed to provide more skip containers for a wider range of recyclable materials (carpets, mattresses etc.) and this coupled with a requirement to pre-sort all waste upon arrival at the site will assist with the achievement of improved recycling and recovery rates.
- 5.5.8 The need to pre-sort all waste would be explained at the appointment booking stage and site attendants would verify that residents, on arrival, had pre-sorted their waste before being allowed to proceed to the HWRC tipping points. Attendants will offer residents assistance with this upon arrival at the sites.

5.6 b) Reconfiguration of Kerbside Collection Services.

Proposal – reduce the frequency of visits per year to empty residual waste (refuse) bins.

- 5.6.1 A recent detailed compositional analysis of our residual waste has told us approximately 50% of the waste in the residual waste bin can be recycled. This option has already been implemented by many of our neighbouring Councils with the aim of increasing participation in the recycling collection services. From experience of other Welsh Local Authority's and further afield, reducing the frequency of residual waste collections offers clear evidence that residents do make significant efforts to take recyclable material out of their residual waste bin and place it in the more appropriate food/dry recycling containers which would continue to be collected weekly.
- 5.6.2 Food waste and dry recycling would remain at weekly collections and an appropriate communications campaign would accompany the service change to promote these continued weekly collections.
- 5.6.3 However, we are seeing those Councils that have already embedded 3 weekly residual collections, are now considering a further change to 4 weekly collections in order to achieve 70% recycling and beyond.
- 5.6.4 With this change alone, and assuming that the majority of residents will not contaminate their brown recycling wheeled bins, an improvement of up to 6.76% is predicted if the 4 weekly option was selected and just over a 4% improvement if the 3 weekly option was chosen.
- 5.6.5 The performance differential, the number of changes to the service for our residents, as well as implementation costs are matters we must consider carefully, alongside the need to increase our recycling performance from 59% to 70% within a very tight timeframe over the next 18 months or so.
- 5.6.6 Introducing this change would be complimented by a change to present collections rounds as the fleet would be servicing zones in a convoy operation. Improved logistics, lends itself to a reduction in missed collections, complaints and a more fuel efficient and decarbonisation friendly service. This will also allow us to synchronise all collection services so that the majority of residents can benefit from all their bins, caddies, containers and bags etc. being picked up on the same prescribed day.

5.7 **c) Delivery of Ancillary Services**

Whilst the implementation of a three or four weekly residual waste collection (refuse) service could be considered a challenge for some, we recognise that there are certain groups with protected characteristics who will require additional/special assistance to deal with the type and amount of waste generated.

5.7.1 Proposal – Absorbent Hygiene Product Collection

This will require the provision of a new collection service for Absorbent Hygiene Products (AHP). This will be a request based service and residents will be assessed on their individual circumstances. It is proposed that colour coded bags are provided as this aligns with how other Authorities operate this system effectively. This new weekly collection service is proposed should the 4 weekly residual waste collection service be favoured.

5.7.2 Proposal – Additional bin capacity

Additional recycling bins and food waste caddies will be provided free of charge to those who require additional recycling capacity. Additional residual bin capacity will only be offered following an individual assessment. It is expected that the number of additional residual bins provided would be minimal.

Furthermore, it is proposed to offer composting bins at a subsidised rate in order to encourage the re-use of garden waste.

5.8 **d) Delivery of Bio Bags**

5.8.1 Proposal – to provide free food waste bio-degradable liners

Presently the amount of food waste recycled per head of population is within the bottom quartile performance across Wales. Participation levels in the weekly food waste caddy emptying service are low across the county borough and this is reflected in the tonnage sent to the anaerobic digestion compared to the amount still being placed in wheeled refuse bins.

We recognise the importance of diverting this food waste out of the wheeled refuse bins and into the food waste caddies. To facilitate an increase in participation it is proposed to offer one year's worth of bio bags free of charge (with a review thereafter) to all residential properties so that householders can readily take part in the presently underused weekly collection service. We will, initially, deliver to every property 6 months-worth of bio-bags together with a complimentary information pack to show how and what to recycle.

During the second part of the year residents will be able to collect additional bio bags (free of charge) from our network of Council buildings situated across the County Borough.

The supply of bio-bags to all residents is estimated to increase participation in the food waste recycling caddy emptying service and in turn, contribute to an improvement in recovery rate of around 1%.

5.9 e) The use of Digital Technology

In line with the corporate digitisation strategy we are looking to maximise opportunities to work smarter and this will focus upon i) developing an appointment system for residents to access the HWRC sites ii) incorporating technology into the collection vehicles to help record data on overall participation rates and matters requiring further action. This technology will provide live links to the back office functions, allowing officers to respond proactively rather than reactively.

Digital technology will help target areas for improvement and a targeted and individual approach to education and communication at the kerbside and this will result in an estimated recovery rate improvement of around 1%.

5.10 **Phase 2 – late 2023/24**

5.10.1 The second phase proposals will include consideration of:

- The kerbside collection of dry recyclables and associated infrastructure requirements,
- Garden waste collection service
- Trade waste collection
- Household Waste Recycling Centres Review
- An education campaign to champion waste minimisation

These options will be considered at a later date in detail and will be subject to associated public consultation and captured within future reports to Cabinet.

5.10.2 The introduction of an appointment service to access the HWRC sites complimented by the introduction of pre-sort requirements is estimated to achieve an increase in recovery rates of up to 3%.

5.11 **Communications and Education**

5.11.1 To achieve success we need to work with our communities to encourage participation and further educate residents about CCBC's circular economy and how through individual actions, taken collectively, can make a positive and significant impact towards considering our waste as a valuable resource.

5.11.2 We recognise our previous approach to communication has not been targeted to individuals or sustained over the long term. The importance of timely and appropriate communications and engagement cannot be underestimated in order to drive the behavioural changes that we are seeking.

5.11.3 To gain a deeper insight into the behaviours and perceived barriers at a local level to recycling, the Council has embarked upon a data gathering programme, using the principles of behavioural psychology to inform a far reaching, targeted and sustained communication, engagement and behavioural change programme.

5.11.4 The Communications strategy will be multifaceted and will include a range of methods to ensure the largescale re-education programme is complimented by targeted campaigns using real time data and behavioural change techniques.

5.11.5 Following the focussed re-education and engagement programme, the Council will consider a formal targeted enforcement programme if deemed necessary.

5.12 **Elected Member Involvement**

It is suggested that Members are involved in shaping the policies and procedures that are necessary to support the waste strategy. It is therefore proposed that a scrutiny Task and Finish group is established consisting of up to a maximum of 10 Members with all Scrutiny Committee Members invited to express an interest. The group will report to the Environment and Sustainability Scrutiny Committee or a Joint Scrutiny Committee meeting, with its finding and recommendations.

5.13 **Gauging Public Opinion**

As previously stated, we cannot do this alone and the support and participation of our residents is essential. It is important that our residents shape the proposals therefore it is proposed to undertake a far-reaching consultation process on the proposals.

The consultation process will utilise a range of systems to ensure that the consultation process is fair, equitable and representative. The 6 week consultation will commence 6th April 2023 and a further report will be considered by the Council's joint scrutiny and Cabinet thereafter.

5.14 **Performance impact**

The cumulative impact of the Phase 1 proposals, supported with the comprehensive communication and engagement programme, is estimated to result in an overall improvement in recycling/recovery rates of up to 12 % (based upon 4 weekly residual collection) and up to 9% (based upon 3 weekly collection). With the current recycling/recovery rate at approximately 59%, these additional improvements can move us towards the required 2024/25 target of 70% and beyond.

6. **CONCLUSION**

The Council's Waste and Recycling service needs to improve and the service changes proposed will help us realise the next statutory target and beyond. Whilst there are challenges to delivering such wide-ranging changes, we are not alone as this is a task faced by most of the Councils across Wales and many are currently planning similar service changes. However, the added challenge we have is that we have a big leap to make in terms of improving our recycling performance in a relatively short period of time. Ultimately, we can only achieve this working with our residents. Our Team Caerphilly approach will help us deliver our ambition of being an exemplar recycling Council and importantly taking positive action now to preserve the Caerphilly of tomorrow.

The proposed Phase 1 improvements will assist in achieving the required 2024/25 WG recycling performance target of 70%. The Phase 2 proposals will further enhance the performance to assist in moving beyond 70% and working towards the proposed 2050 zero waste target.

Indications are that the three weekly collection changes will not achieve the required Welsh Government performance target, whereas the four weekly collection option is likely to ensure the Welsh Government performance target of 70% in 2024/2025 will be achieved.

7. ASSUMPTIONS

Throughout all the proposals it has been assumed that the necessary assumptions in behaviour changes and participation rates are realised. The projected forecasts associated with the estimated improvements proposed have been reviewed and verified independently by WG commissioned consultants.

8. SUMMARY OF INTEGRATED IMPACT ASSESSMENT

- 8.1 The respective IIA forms have been drafted and can be found via the links below. They provide contingency arrangements to meet the needs and aspirations of our residents with protected group characteristics and special requirements. These will be further refined following consideration of the public consultation feedback.

[Link to IIA-form-waste-strategy-report](#)

[Link to IIA-form-hwrc-booking-system-a-pre-sort](#)

9. FINANCIAL IMPLICATIONS

- 9.1 There are considerable financial implications associated with the delivery of the draft Waste & Recycling Strategy. The 2023/24 budget for this area is circa £12 million. Indicative costs and potential savings, **based on the 4 weekly residual collections**, are detailed in the following tables and indicate a £979,000 saving: -

Indicative Costs – 4 Weekly Collection

Description	One-off Costs £000's	Annual Costs £000's
Increase in Dry Recycling costs arising from redirected residual waste	-	521
Increase in Green Recycling costs arising from redirected residual waste	-	205
Increase in Food Recycling costs arising from redirected residual waste	-	60
Additional staff for Absorbent Hygiene Product (AHP) collection service	-	288
Three new vehicles for AHP collection service	300	-
AHP Liners	-	42
Digital technology for HWRC appointment system and in-cab system	45	131
Provision of food liners for food waste	158	-
Additional staff at Household Waste Recycling Centres (HWRC's)	-	263
Rebranding of vehicles and equipment	84	-
Communications campaign – promotion, letters, leaflets etc.	57	-
Fixed-Term Communications Officer	47	-
TOTAL: -	691	1,510

Potential Savings – 4 Weekly Collections

Description	Potential Annual Savings £000's
Projected reduction in residual waste tonnage	1,601
Reduction in tonnage through implementation of black bag ban (pre-sorting of waste at HWRC's)	888
TOTAL: -	2,489

9.2 Indicative costs and potential savings, **based on the 3 weekly residual collections**, are detailed in the following tables and indicate an £882,000 saving: -

Indicative Costs – 3 Weekly Collection

Description	One-off Costs	Annual Costs
	£000's	£000's
Increase in Dry Recycling costs arising from redirected residual waste	-	311
Increase in Green Recycling costs arising from redirected residual waste	-	-21
Increase in Food Recycling costs arising from redirected residual waste	-	44
Additional staff for Absorbent Hygiene Product (AHP) collection service and Disposal (106K)	-	288
Three new vehicles for AHP collection service	300	-
AHP Liners	-	42
Digital technology for HWRC appointment system and in-cab system	45	131
Provision of food liners for food waste	158	-
Additional staff at Household Waste Recycling Centres (HWRC's)	-	263
Rebranding of vehicles and equipment	84	-
Communications campaign – promotion, letters, leaflets etc.	57	-
Fixed-Term Communications Officer	47	-
TOTAL: -	691	1,058

Potential Savings – 3 Weekly Collections

Description	Potential Annual Savings
	£000's
Projected reduction in residual waste tonnage	1,038
Reduction in tonnage through implementation of black bag ban (pre-sorting of waste at HWRC's)	902
TOTAL: -	1,940

- 9.3 Whilst there will be significant annual costs arising from the proposed changes in the draft Waste & Recycling Strategy, it is anticipated that these will be offset by savings through reductions in residual waste tonnages and the pre-sorting of waste at HWRC's. As mentioned above, these figures are indicative at this stage, and will be refined over the coming months. Depending on what decisions are ultimately made the ongoing net financial impact will be factored into the budget setting process for the 2024/25 financial year.
- 9.4 Projected one-off costs as detailed above total £691k, and these will need to be funded through the use of reserves. Firm funding proposals will be presented to Cabinet in a future report.
- 9.5 It is important to stress that the council will face potential WG financial penalties for not achieving recycling targets, equating to £200k for each percentage point below target. Current performance is circa 60% with the 2024/25 WG target being 70%. This 9% below the future target could result in an annual financial penalty of £1.8m.

10. PERSONNEL IMPLICATIONS

- 10.1 The proposals in this report would mean changes to the Waste service including the frequency of some waste collections and the use of the HWRC's. However, none of these changes would result in reduced numbers of staff within the service.
- 10.2 Following feedback from Members and the public as part of the consultation exercise, a workforce plan to support service delivery will be developed, which will be fully costed and included in the report to Cabinet. HR and the Trade Unions will be engaged in this process.

11. CONSULTATIONS

- 11.1 The draft Waste & Recycling strategy is written against the context of ongoing conversations the council has held with residents through its engagement programme 'The Caerphilly Conversation'.

In November/December 2022, the Council commenced a phase of engagement called 'What matters to you?'. 93% of respondents agreed that waste collection and recycling services should continue to be a priority when planning council services and budgets for 2022/23 and beyond. Through that same engagement activity, 86% of respondents felt that waste collection and recycling services was as important or more important to

them than 12 months ago. Insight from the 'What matters to you?' phase also suggested that residents appreciate the simplicity of our current recycling system in place. In addition, an online 'quick poll' sought additional views on waste and recycling during January 2023. Key insights from this poll, which received 2,632 responses included:

- 11.1.1 79% of respondents said they recycle food waste at the kerbside. From those respondents who don't currently recycle food waste, their reasons for not doing so were primarily that they compost any food waste, they don't waste any food, they don't like the smell/feel its unclean or they don't have any liners to place inside the caddy.
- 11.1.2 99% of respondents said they regularly recycle using their brown bin/recycling box/recycling bags at the kerbside.
- 11.1.3 73% of respondents said they regularly make use of the green/garden waste recycling service. From those respondents who don't, their reasons for not doing so were primarily that they don't have any garden waste/a garden or that they use the service but seasonally (not year-round).
- 11.1.4 Summary Reports for the 'What matters to you?' November/December 2022 engagement phase and the 'Caerphilly Conversation – budget setting 2023/24' engagement programme can be found at www.caerphilly.gov.uk/caerphillyconversation.

11.2 Internal Consultation:

- 11.2.1 A meeting with Trade Union (T U) colleagues took place on 22nd March 2023. The proposals detailed in the proposed waste strategy were broadly accepted on the understanding that the proposed changes were not intended to reduce the workforce, although some "repurposing" of existing roles may be required. As the workforce plan is developed, T U colleagues will continue to be engaged throughout.
- 11.2.2 A meeting of the operational workforce took place on 23rd March 2023 to discuss the key proposals detailed within the draft waste strategy. The proposals were broadly supported. There was also unanimous acceptance and understanding of the need to change, with an expectation that the current operational challenges associated with the current operating model would be addressed.
- 11.2.3 A meeting of the Joint Scrutiny Committee took place on 27th March 2023 to consider the draft waste strategy and the key proposals contained within it. The comments raised and discussed at the meeting are detail in Appendix 2.

11.3 Public Consultation- gauging public opinion:

As previously stated, we cannot do this alone and the support and participation of our residents is essential. It is important that our residents shape the proposals and as such it is proposed to undertake a far-reaching consultation process, The planned 6 week consultation will run for a six week period currently proposed from 6th April 2023 until 19th May 2023. Residents will be invited to offer their views in a variety of ways:

- 11.3.1 A survey will be available on the council's website www.caerphilly.gov.uk. It will be available online and in printed copy. Hard copies will be available from all libraries across the county borough and returned via libraries or through the post.
- 11.3.2 A series of informal face-to-face drop-in sessions for residents will be arranged at libraries across the borough. Three online face-to-face sessions will also be scheduled. As far as possible, these sessions will be held on different days of the week and different times of the day, including early evening, to enable as many people as possible to attend. They will also be planned to coincide with times of highest footfall at individual libraries.
- 11.3.3 A dedicated meeting of the Viewpoint Panel. The Viewpoint Panel is a group of residents who are regularly invited to get involved in the council's engagement and consultation activities. Anyone who is a resident of the county borough can join.
- 11.3.4 Online engagement opportunities through the council's new digital engagement platform.
- 11.3.5 Targeted engagement with stakeholders and seldom heard groups – identification of these was supported through the development of in-depth integrated impact assessments (IIAs) for the draft proposals.
- 11.3.6 Upon conclusion of the consultation a further report will be considered by the Council's Joint Scrutiny Committee and Cabinet thereafter.

12. STATUTORY POWER

- 12.1 The Waste Framework Directive and the subsequent Waste (Circular Economy) (Amendment) Regulations 2020

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Consultees:

- Christina Harrhy, Chief Executive
- Cllr. Chris Morgan, Cabinet Member for Waste, Leisure and Green Spaces
- Cllr Sean Morgan, Leader of Council
- Mark S. Williams, Corporate Director for Economy and Environment
- Hayley Jones, Waste Strategy and Operations Manager
- Stephen Harris, Head of Financial Services and S151 Officer
- Rob Tranter, Head of Legal Services and Monitoring Officer
- Dave Roberts, Principal Group Accountant
- Cath Forbes-Thompson, Scrutiny Manager
- Liz Lucas, Head of Customer and Digital Services
- Rob Hartshorn, Head of Public Protection, Community and Leisure Services
- Lynne Donovan, Head of People Services
- Steve Pugh, Communications Manager
- Sarena Ford, Communications Manager
- Hayley Lancaster, Transformation Manager, Engagement
- Neil Funnell, GMB
- Paul Gage, GMB
- Lianne Dallimore, Unison

Juan Garcia, Unison
Rosie Lewis, Unison
Gary Parr, Unite
Alan McCarthy, Unite

Appendices:

- Appendix 1 CCBC Draft Waste & Recycling Strategy to 70% and Beyond
- Appendix 2 Joint Scrutiny comments 27th March 2023