

**DRAFT Belfast City Council Response to the consultation on amending options for the assessment of technical competence.**

**Question 1: Do you agree with the proposal to add EU Skills as an assessor of technical competence, for the purposes of waste management licensing and permitting in Northern Ireland? If not please explain why.**

Broadly speaking, we are in agreement with the proposal. Potentially, it could increase the choice of service provision available to operators of authorised waste facilities and could encourage competition within the Northern Ireland marketplace. This increase in competition, through provision of proposed additional assessment mechanism is to be welcomed. Stimulating the Assessors and Skills marketplace may (eventually) lead to waste operators being offered a better range of high quality services at competitive prices and also result in more efficiencies and better awareness throughout the waste industry of the competency scheme itself. By providing waste operators with flexibility and additional options around the assessment of technical competence, the most appropriate assessment model can be selected by each organisation.

We note that a Competence Management Systems (CMS) approach has been used throughout the waste industry in the rest of the UK for a number of years now. We also note that EU Skills have been approved to operate as a provider of assurance of technical competence by DEFRA in England and Wales and by SEPA in Scotland.

For waste operators choosing to adopt a CMS approach, this will no doubt have resource implications for those businesses involved, in terms of staffing, time and cost of implementing, managing and maintaining the system. Specifically, if Belfast City Council were to adopt the EU Skills system, there would likely be a heavy resource requirement, particularly in terms of officer time, to implement and embed the CMS and to move across from the existing WAMITAB model. In addition, staff would be required to maintain the system on an ongoing basis and to facilitate annual audits (certification every 3 years with yearly surveillance). It remains to be seen whether this model will be more or less suitable than the current system operated by WAMITAB. Ultimately, it would shift the emphasis away from operative staff to technical officers in terms of workload and provision of evidence and compliance matters. This could also have the undesired effect of de-skilling our workforce, as the CMS model sees a shift away from assessing individual competence to assessing organisational competence.

Being management system-based, the CMS assessment could potentially be integrated within waste operators' existing management systems (such as ISO standards in environment, occupational health & safety, quality, etc.). This may be beneficial, in the long run, to those waste operators already maintaining such systems and it could provide a more holistic approach to competency, training and compliance etc. Additionally, the organisations would need to meet the legislative technical competence requirement as a corporate body, rather than being reliant on individuals within the organisation. Again, however, we would emphasise the initial work that would be required by organisations in moving from one assessment system to another, particularly during the implementation phase.

Another issue that needs to be considered is the current lack of availability of assessor companies and organisations within Northern Ireland. (Under the WAMITAB model). Whilst the introduction of an alternative assessor model should potentially drive competition within this sector, this might take time to build the skills resource required to deliver the new model and there still is the chance that waste operators may again be faced with a situation where there is little choice of local service providers available.

**Question 2: Are there any other bodies/organisations which would potentially be suitable to act as an assessor of technical competence in respect of waste management licensing and permitting in Northern Ireland? Please provide evidence to support any suggestions.**

N/A - We are not in a position to respond to this request.