

To Whom it may concern,
Please find below response to the consultation on the scrap metal dealers bill from
Antrim and Newtownabbey Borough Council.
Thanks
Lisa

Consultation Response.

1. Timeframe

In responding to the invitation to submit views in respect of this Bill, the Council would firstly like to make comment on the short timeframe associated with such.

2. Content

The Council through arc21, in their response to the previous consultation, supported the objectives etc relating to the introduction of such a Bill. However it was suggested that Council operations should be exempted from requiring a specific licence in respect of scrapmetal dealing.

Clause 16 provides definitions for the purposes of the Act including the definitions for 'a scrap metal dealer', 'a mobile collector' and 'scrap metal'. Council collects scrap metal from households and receives scrap metal at the Household Waste Recycling Centres from which commercial arrangements are entered into for the processing of the collected material. Accordingly, it could be interpreted from the provisions of Clause 16 that Councils will be subject to the requirements of the Act including the necessity to hold a duly authorised scrap metal licence and the associated administrative obligations.

Taking into account the other checks and balances on Council operations, we would contend this would place unnecessary burdens upon us.

Consequently The Council would ask the NI Assembly to incorporate suitable provision in the legislation which makes it clear that the Act does not apply to Councils and their waste collection and management operations.

3. Enforcement

The Council through arc21, in our response to the previous consultation, agreed that the Department of the Environment be made responsible for regulatory activities associated with ensuring compliance with the legislation. We welcome this in the proposed Bill as the Department are undoubtedly best placed to undertake this role. However, it is important to stress that it will be important to ensure that the Department is adequately resourced to ensure a robust monitoring and enforcement regime will be put in place. It is hoped that the forthcoming reorganisation of central government departments and agencies will not detrimentally impact on such.

Lisa Mayne

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Antrim and Newtownabbey Borough Council