

Impact Assessment

Version 2017

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Assessment of:	Plastics Strategy
Service:	Planning, Transport and Environment

Head of Service:	Dave Black
Date of sign off by Head Of Service/version:	18/5/18
Assessment carried out by (incl. job title):	Doug Eltham, Environment and Sustainability Policy Officer

Section 1 - Background

Description:	<p>This new environmental strategy and action plan will enable the Authority to continue to enhance its environmental performance and deliver its over-arching Environmental Policy.</p> <p>The Single-Use Plastics Strategy and Action Plan is DCC's response to the issue of plastics accumulating in the environment (particularly the marine environment), brought to the nation's attention by the BBC Blue Planet II series and more locally by the Plastic Free Coastlines initiative operated by Surfers Against Sewage. It complements and contributes to the delivery of the Environmental Policy, the Devon Waste and Resources Management Strategy, the Corporate Waste Strategy and the Environmental Sustainable Procurement Strategy. The Strategy majors on single-use food and beverage packaging and tableware due to the prominence of this type of waste in marine plastic litter. It has four strategic themes that consider how DCC can use its position and responsibility for service delivery to support collective action on this issue. The themes are: Getting our own house in order; Working with suppliers and contractors; Helping raise awareness across Devon; and Enabling Devon to take action.</p>
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	As part of 'Getting our own house in order', DCC commits to removing all avoidable, single-use-plastic food and beverage packaging and tableware by 2020.
Reason for change/review:	The environmental concerns about single-use plastics have been brought to the nation's attention by the BBC Blue Planet II series and more locally by the Plastic Free Coastlines initiative operated by Surfers Against Sewage.

Section 2 - Impacts, options and recommendations

See sections 3, 4 and 5 for background analysis

Options Appraisal and Recommendations:	The alternative option is not to act on single-use plastics This is undesirable due to the accumulation of plastics in the environment, particularly the sea.
Social/equality impacts (summary):	None on the protected characteristics. The health of the natural environment and its ability to provide services and resources underpins our own health and happiness. By minimising the amount of plastic entering the environment we will be contributing to reducing this form of pollution and so safeguarding the ability of the environment to provide us with food free from micro-plastic contamination.
Environmental impacts (summary):	No negative effects, but a variety of positive effects on pollution and use of natural resources.
Economic impacts (summary):	<p>Treating plastic as a waste rather than a resource prematurely removes its value from the economy. Switching to renewable alternatives or ensuring that circular economy principles are applied so that more plastic is recycled will increase the value that can be extracted from resources before final disposal.</p> <p>The health of the natural environment and its ability to provide services and resources underpins all economic activity. By minimising the amount of plastic entering the environment we will be contributing to reducing this form of pollution and so safeguarding future economic prosperity.</p>

<p>Other impacts (partner agencies, services, DCC policies, possible 'unintended consequences'):</p>	<p>The 'lifecycle' environmental and social effects of some of the alternatives to single-use plastics are not well understood – certainly not in impartial literature freely available. For example, is aluminium foil 'better' than cling film?</p> <p>DCC's Environmental Performance Management Group, comprised of expert colleagues representing various disciplines, will keep their knowledge on such issues up to date and amend the strategic approach accordingly.</p>
<p>How will impacts and actions be monitored?</p>	<p>Governance arrangements are in place through the Environmental Performance Board and Environmental Performance Management Group which monitors project implementation quarterly and produces an annual Environmental Performance Statement.</p>

Background Analysis

This section describes how relevant questions and issues have been explored during the options appraisal.

Section 3 - Profile and views of stakeholders and people directly affected

People affected:	Devon residents and visitors, DCC staff, DCC contractors and suppliers
Diversity profile and needs assessment of affected people:	All protected characteristics are represented within the affected people groups.
Other stakeholders (agencies etc.):	None
Consultation process and results:	<p>The proposal is considered to have a positive impact on Devon residents and visitors. Consultation has not been undertaken with this affected group.</p> <p>DCC staff and DCC's principal facilities management and catering supplier, Devon Norse, have been represented on the task group that has prepared the strategy and action plan.</p>
Research and information used:	The expertise of the task group brought together to prepare the strategy included environmental sustainability, waste and resource management, procurement, retail, catering and facilities management.

Section 4a - Social Impacts

Giving Due Regard to Equality and Human Rights

The local authority must consider how people will be affected by the service, policy or practice. In so doing we must give due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation

- Advance equality of opportunity and
- Foster good relations.

Where relevant, we must take into account the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, sexual orientation, race, and religion and belief.

This means considering how people with different needs get the different services they require and are not disadvantaged, and facilities are available to them on an equal basis in order to meet their needs; advancing equality of opportunity by recognising the disadvantages to which protected groups are subject and considering how they can be overcome.

We also need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are:

- Informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations.
- Proportionate (negative impacts are proportionate to the aims of the policy decision)
- Fair
- Necessary
- Reasonable, and

- Those affected have been adequately consulted.

Characteristics	In what way can you eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage? Are there any lawful, reasonable and proportionate, unavoidable negative consequences?	In what way can you advance equality (meet needs, encourage participation, make adjustments for disabled people, 'close gaps'). In what way can you foster good relations between groups (tackle prejudice and promote understanding), if relevant?
All residents (include generic equality provisions):	None	None
Age:	None	None
Disability (incl. sensory, mobility, mental health, learning disability, ill health) and carers of disabled people:	Some people with a disability require a straw. Plastic straws will be retained by the Coaver Club to be issued on request.	None
Culture and ethnicity: nationality/national origin, skin colour, religion and belief:	None	None

Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed).	None	None
Sexual orientation and marriage/civil partnership:	None	None
Other socio-economic factors such as families, carers, single people/couples, low income, vulnerability, education, reading/writing skills, 'digital exclusion' and rural isolation.	None	None
Human rights considerations:	None	

Supporting independence, wellbeing and resilience?

Give consideration to the groups listed above and how they may have different needs.

In what way can you support and create opportunities for people and communities (of	None
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place and interest) to be independent, empowered and resourceful?	
In what way can you help people to be safe, protected from harm, and with good health and wellbeing?	None
In what way can you help people to be connected, and involved in community activities?	None

Section 4b - Environmental impacts

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties.

The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please select from the table below and proceed to the 4c, otherwise complete the environmental analysis table):

	Devon County Council's Environmental Review Process for permitted development highway schemes.
	Planning Permission under the Town and Country Planning Act (1990).
	Strategic Environmental Assessment under European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
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Reduce waste, and send less waste to landfill:	None	The strategy and action plan will encourage more thoughtful use and disposal of plastic
Conserve and enhance biodiversity (the variety of living species):	None	The strategy and action plan will encourage more thoughtful use and disposal of plastic which will reduce the amount of plastic finding its way into the environment where it can harm wildlife
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:	None	The strategy and action plan will encourage more thoughtful use and disposal of plastic which will reduce the amount of plastic finding its way into the environment to litter our landscapes
Conserve and enhance the quality and character of our built environment and public spaces:	None	The strategy and action plan will encourage more thoughtful use and disposal of plastic which will reduce the amount of plastic finding its way into the environment to litter our built environment and public spaces
Conserve and enhance Devon's cultural and historic heritage:	None	None
Minimise greenhouse gas emissions:	Uncertain – encouraging more thoughtful use of plastic (manufactured from fossil fuels) will reduce greenhouse gas emissions. However, some alternatives to plastic that will be promoted by the strategy could have a higher carbon footprint during manufacturing and transport. Furthermore, if bioplastics or paper alternatives end up in landfill, they will produce methane which is a powerful greenhouse gas. To manage this risk, it is important for the strategy to promote the reuse and recycling of plastic alternatives and raise awareness of the implications of inappropriate disposal.	
Minimise pollution (including air, land, water, light and noise):	Uncertain – encouraging more thoughtful use of plastic will minimise the amount of plastic that is accumulating in the environment. However, some alternatives to plastic that will be promoted by the strategy	

	could have implications for local pollution near the manufacturing facilities. To manage this risk, it is important for the strategy to promote the reuse and recycling of plastic alternatives.	
Contribute to reducing water consumption:	None	None
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):	None	None
Other (please state below):		

Section 4c - Economic impacts

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:	None	None
Impact on employment levels:	None	None
Impact on local business:	None	The health of the natural environment and its ability to provide services and resources underpins all economic activity. By minimising the amount of plastic entering the

		environment we will be contributing to reducing this form of pollution and so safeguarding future economic prosperity.
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Section 4d -Combined Impacts

Linkages or conflicts between social, environmental and economic impacts:	None
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Section 5 - 'Social Value' of planned commissioned/procured services:

How will the economic, social and environmental well-being of the relevant area be improved through what is being proposed? And how, in conducting the process of procurement, might that improvement be secured?	n/a
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