

<b>REPORT TO:</b>	<b>Streets Environment and Homes Scrutiny Sub-Committee 28 September 2021</b>
<b>SUBJECT:</b>	<b>Review of the Waste &amp; Street Cleansing Contract</b>
<b>LEAD OFFICER:</b>	<b>James Perkins; Head of Environmental Services</b>
<b>CABINET MEMBER:</b>	<b>Cllr Muhammad Ali; Cabinet Member for Sustainable Croydon</b>
<b>PERSON LEADING AT SCRUTINY COMMITTEE MEETING:</b>	<b>Steve Iles; Director of Public Realm</b>
<b>PUBLIC/EXEMPT:</b>	Public

#### **COUNCIL PRIORITIES 2020-2024**

*Include here a brief statement on how the recommendations address one or more of the Council's priorities:*

- We will live within our means, balance the books and provide value for money for our residents.*
- We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.*
- We will focus on providing the best quality core service we can afford. First and foremost, providing social care services that keep our most vulnerable residents safe and healthy. And to keep our streets clean and safe. To ensure we get full benefit from every pound we spend, other services in these areas will only be provided where they can be shown to have a direct benefit in keeping people safe and reducing demand.*

[Council's priorities](#)

<b>ORIGIN OF ITEM:</b>	<b>This Item was identified as a topic for Scrutiny</b>
<b>BRIEF FOR THE COMMITTEE:</b>	<b><i>To inform and update the committee on the performance of the Council's waste collection and street cleansing contract. Identifying areas of service improvement and management of known and emerging risks to the service. A legislative backdrop is also provided to inform the committee of future challenges and opportunities.</i></b>

## 1. EXECUTIVE SUMMARY

- 1.1. *This report seeks to inform and update committee members in the progression, performance and efficiencies within the Council's waste collection and street cleansing contract it holds with Veolia Environmental Services since its award in 2017. Statistical and narrative information is provided across a wide range of service areas within the body of the report and appended documents. The report provides further information on the local, regional and national legislative drivers affecting this service area and in terms of the national agenda, provides the committee with information on the changes expected by the new national waste strategy and the legal, financial and operational impacts this may have on the delivery of services going forward. Current service delivery challenges and risks are also detailed along with the mitigation work being carried out by officers and contractor staff to minimise the impact of such risks onto the delivery of the services.*

## 2. Review of Waste and Street Cleansing Contract

### Background Information

#### **South London Waste Partnership Contract**



- 2.1. The South London Waste Partnership (SLWP) was formed in 2003 between the boroughs of Croydon, Kingston, Merton, and Sutton. SLWP has a proven record of providing improved and more cost-effective waste management services through the procurement of waste disposal, recycling and Household Reuse and Recycling Centre contracts.
- 2.2. Veolia were the successful bidder for a new waste and recycling contract, and a new service commenced on the 1<sup>st</sup> April 2018 for street cleansing, and the 1<sup>st</sup> October 2018 for the waste and recycling collection service.

2.3. The South London Waste Partnership (SLWP) contract has harmonised the waste collection services across the boroughs of Croydon, Kingston, Merton and Sutton. This provides residents with a consistent message throughout the boroughs.

### **2018 Service Change**

2.4. In 2018 Croydon embarked on an ambitious change to the waste and recycling service. The start of a new waste and recycling contract allowed Croydon to review the recycling and waste service it provided to residents.

2.5. From both a financial and environmental perspective recycling is preferable to disposal of residual waste. Environmentally, recycling helps conserve the finite resources associated with making new products and reduces dependency on virgin materials. Financially it costs considerably less to recycle waste than it does to dispose of it as residual waste.

2.6. Recognising the previous waste collection system Croydon provided disproportionately more capacity for residual waste, which made up approximately 60% of the total waste capacity. A decision was made to increase the container capacity for households to recycle more whilst simultaneously reducing the capacity for residual waste.

2.7. Service changes and efficiencies around the harmonisation of existing services included;

- Food waste collected every week
- Residual (non-recyclable or 'black bag') waste collected every fortnight
- Card and paper collected every fortnight
- Tins, plastics glass collected every fortnight
- The changes to the provisions were as follows:
  - 240L refuse bin – replaced by a 180L bin
  - 55L paper and card recycling box – replaced by a 240L bin
  - 55L dry mixed recycling box – replaced by a 240L bin (this was the existing residual waste bin)
  - Food bins/caddies – remained the same.

- 2.8. Figures show that residents have embraced the new service with recycling rates improving from 38% before the roll out to 49% in 2019/20. Less residual waste was presented per household and the amount of recycling significantly improved.
- 2.9. Other services are also harmonised across the partnership area. The street cleaning service proposals operate on a neighbourhood basis. Parks and grounds maintenance service resource is flexible with dedicated staff at key locations. Boroughs are able to share depot space, enabling the services to operate more efficiently

### **3. Policy Context**

- 3.1. There are currently significant changes being planned and proposed to the scope and scale of the waste management legislative framework governing the services provided at a local level and how these services are to be delivered. The Environment Bill in particular provides the opportunity to bring the waste management legislative frameworks more in line to complement the emerging carbon reduction and circular economy regimes.

### **4. Croydon Policy**

#### **Climate Emergency**

- 4.1 The Council declared a climate change and ecological emergency in July 2019 and more recently 7<sup>th</sup> June 21 cabinet welcome the report and recommendations of Croydon Climate Crisis Commission and record the Council's thanks to the Commission and the New Economics Foundation for their thorough and committed work in challenging circumstances
- 4.2 Single use plastic is one of the most prevalent forms of waste and litter, and is the focus of increasing public concern, the Council has confirmed they have secured funding for three water fountains to be installed in the borough. This will assist residents in cutting down on the use of single use water bottles and encourage reusable bottles.
- 4.3 The Council are also in agreement with the aims of grass roots organisations within Croydon that are focusing on reducing single use plastic. There is already two plastic free shops in the borough.
- 4.4 It must be noted that the Veolia contract and the services within it form only a small part of the solutions required to meet the climate emergency aims and objectives.

#### **Regional Policy**

- 4.5 The Mayor of London Recycling and Reduction Plan (RRP); a defined set of new initiatives, actions and service changes designed to reduce the quantity of wastes being produced whilst maximising the opportunities for re-use, recycling and composting set against a defined timescale. Croydon's RRP is appended to this report.

#### **National Policy**

#### **Environment Bill**

- 4.6 At an overarching level, the Bill sets out a framework for future environmental ambition and accountability and puts the Government's 25 Year Environment Plan on a statutory footing. It includes proposals to create an Office for Environmental Protection (OEP) that will provide a governance and enforcement framework to replace that previously provided by the European Commission and the Court of Justice of the European Union.
- 4.7 It also seeks to ensure that key environmental principles enshrined in various international agreements, EU Treaties and environmental legislation have a legal standing and continue to underpin environmental law and policy-making in England
- 4.8 The Bill also contains proposals and enabling powers across four environmental priority areas – nature and biodiversity, air quality, water, and resources and waste – and is critical to the delivery of a range of policy proposals currently being developed and consulted on with the resources and waste sector.

### **Resources and Waste Strategy (2018)**

- 4.9 In December 2018, the government published a new, national Resources and Waste Strategy for England within which, key operational, administrative, financial and legislative changes were proposed. These include
- Consistency in collections – providing for streamlined and consistent collection systems and services to all households and businesses in England
  - Details of a new and extended responsibilities for manufacturers, suppliers and distributors of recycled and recyclable packaging.
  - The re-introduction of a Deposit Return Scheme (DRS) for all glass, metal and plastic drinks containers in England.
  - A weekly food waste collection service to all households and businesses in England.
  - A garden waste collection service to be provided free of charge to households.
- 4.10 Two rounds of consultation have been carried out on many of the above proposals since early 2019 with the second round closing in June 2021. We await the outcome of these consultations in readiness for a final Strategy document being published and adopted.

## **Service Provided**

- 4.11 Veolia provide both waste and street cleansing services to Croydon. The service is an output based contract.
- 4.12 The waste service operates Monday to Friday, including most bank holidays. It include collections for kerbside recycling, flats recycling, clinical waste collection bulky waste collections (paid for service), garden waste collection (paid for service), clinical waste and assisted collections. The scale of this service including performance data is appended to this report.
- 4.13 The streets service is a provided 364 days a year (Christmas day is excluded). The service includes fly tip clearance, mechanical sweeping, maintain streets to a grade B or above, litter clearance, leaf clearance and market cleansing. The scale of this service including performance data is appended to this report.

## **5. 2020-21 Service Delivery**

### **Covid 19 Impact**

- 5.1 In March 2020 a business continuity plan was agreed and activated to minimise the impact of Covid 19. As a Priority 1 service Veolia continued to operate and maintained front line services in Croydon. The service had to make service delivery changes during an ever changing landscape. This led to some services partially suspended (bulky waste collections and bin deliveries) however minimal disruption was felt by residents as the frontline collections happened to schedule. A robust, Covid-specific business continuity plan was created to allow for the prioritisation of statutory collections over discretionary services but as stated above, disruption to collection services were fortunately kept to a minimum.
- 5.2 The pandemic led to a change in behaviour that was not anticipated or planned for which has meant the landscape now being operated in was very different from a year ago and the impact will be felt much longer. Although front line services were maintained residents working from home saw a large amount of waste diverted from commercial streams being moved into household collections. The HRRC being closed exacerbated this and has impacted upon tonnages of waste collected and the recycling rate falling due to increased refuse collected.
- 5.3 It is known that there was a c.20% increase in the quantity of Household residual (black bag) waste during 2020 - 21 and a c15% increase in the quantity of recycling wastes produced. These disproportionate increases will have a detrimental impact on several national indicators for this period, including increases in the kilograms per household per year, kilograms per head per year and a reduction in our recycling performance.
- 5.4 All services were being deployed daily from October 2020. The impact of Covid is still providing challenges for the collections service with drivers and loaders impacted, especially post-Christmas when cases went up nationally, however these were isolated incidences and managed locally. The national shortage of HGV and LGV drivers (detailed in this report) is compounding this ongoing issue and is being

proactively managed by a regularly updated Business Continuity Plan ensuring that core services are protected as far as possible and are delivered in full each week.

### Waste Performance

Total collections for this period is **22,701,608**

Missed Bins<sup>1</sup> 20/21

Refuse missed per 100k	125
Recycling missed per 100k	107
Paper missed per 100k	83
Food missed per 100k	60
Missed per 100k overall <sup>2</sup>	98

- 5.5 Residents are requested to report missed waste collections via the councils reporting systems with the contractual requirement for VES to re-attend the address within 24 hours of receiving notification. Address management, in-cab technology exists in all collection vehicles with the ability to report 'bins not presented' or 'bins not found' at any given address but in all cases, VES will re-attend addresses and collect bins when 'at fault' and 'not at fault' Monthly and quarterly performance data across all KPIs is appended to this report. Reports of missed collections fell by over 30% during the imposed periods of lockdown during 2020 and 2021. For recurring instances of missed collections from a single household, when identified a period of weekly monitoring by VES managers will be put in place for the following four collections and photographic evidence used to ensure collections have been carried out.

### Improvement Plan

- 5.6 In January 2021 the service ran a three week catch up programme following the three bank holidays, this is always a challenging time with excess waste produced, however Veolia deployed all services with minimal disruption to residents. In February 2021 it was recognised that the performance was not improving despite the introduction of new SPI's in September 2020. In March 2021 an improvement plan was devised by Veolia and Croydon Council officers to drive performance in the contract. The data shows a continuous improvement in the number of bins missed from February until May, this was set to continue with more improvements planned. In June 2021 a national driver shortage<sup>3</sup> began to emerge and Veolia struggled to maintain the improved performance.

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<sup>1</sup> This is old best value environmental indicator number 10 which was abolished in 2008, despite this all local authorities have continued to use this indicator as a method for monitoring waste contracts across the country

<sup>2</sup> The contractual target is 30 per 100k, this is however currently under review

<sup>3</sup> There has been national coverage on this issue as it is impacting all industries that rely on HGV drivers

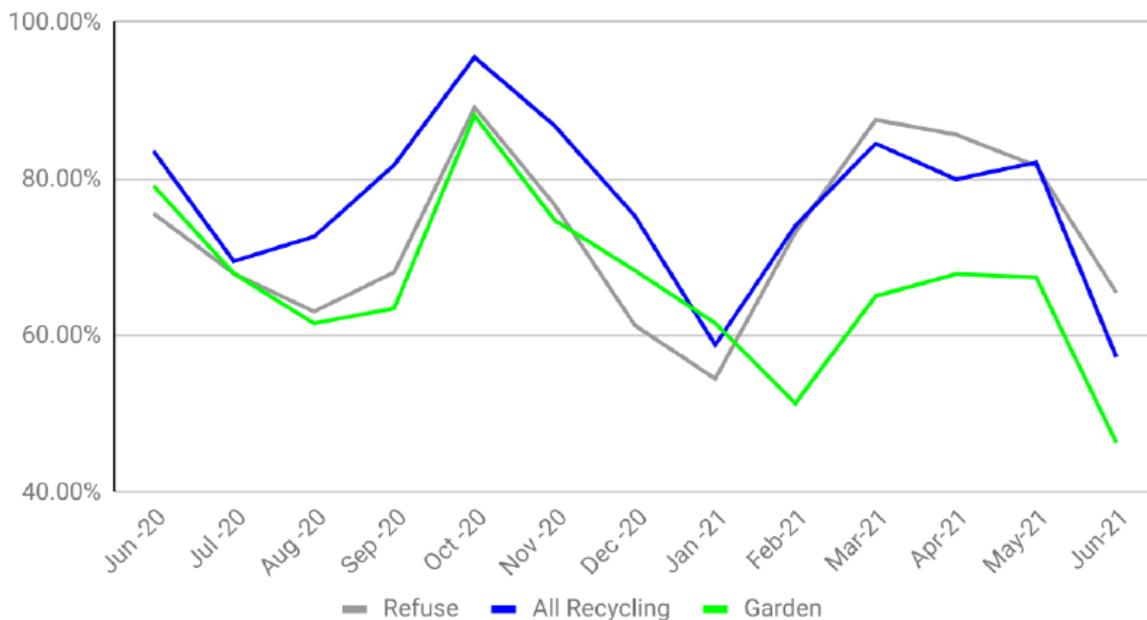
## Month on Month performance

	Sep -20	Oct -20	Nov -20	Dec -20	Jan -21	Feb-21	Mar-21	Apr-21	May-21	Jun-21
Refuse per 100k	108	115	134	124	177	105	106	80	54	125
Recycling per 100k	120	75	85	188	116	96	91	77	70	153
Paper per 100k	91	72	74	65	89	56	69	64	40	109
Food per 100k	71	45	44	48	50	42	47	43	38	76
Garden Waste Strike Rate	99.68%	99.62%	99.80%	99.75%	99.77%	99.63%	99.67%	99.80%	99.06%	98.99%

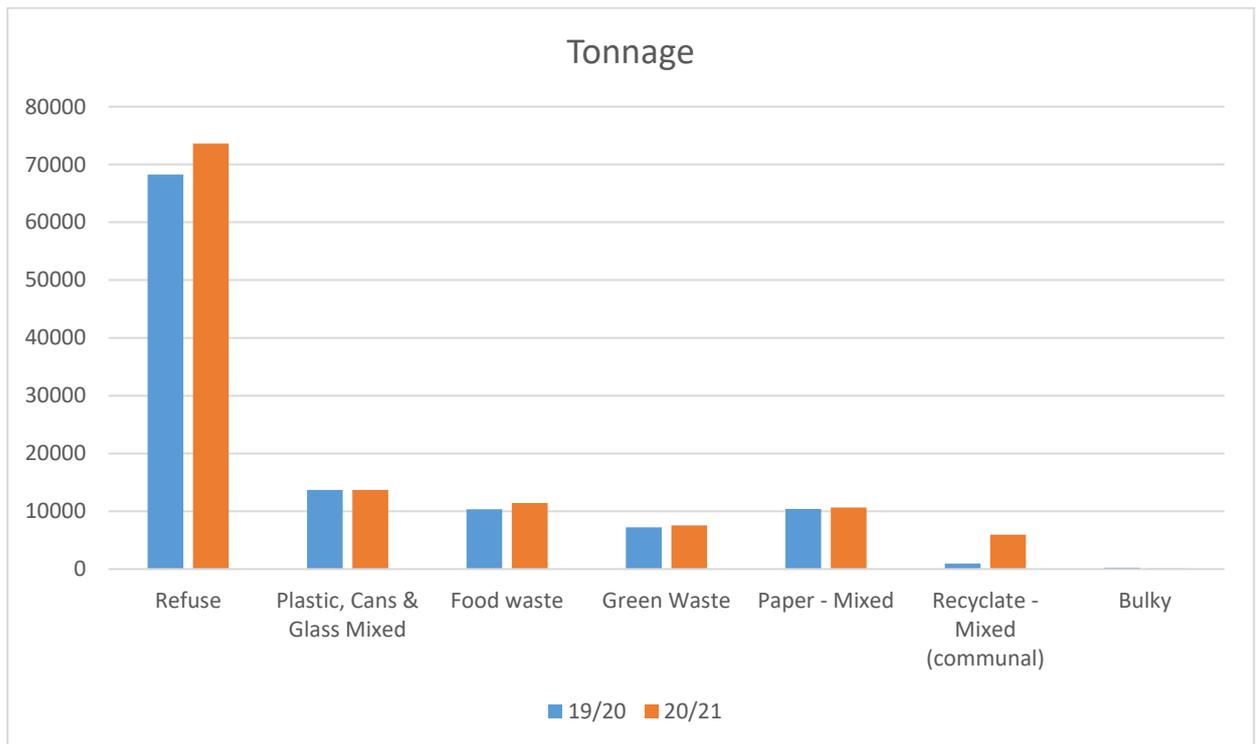
5.7 The scale of this service including performance data is appended to this report.

5.8 The below graph shows that from October 2020 Veolia were struggling to collect missed bins in the contractual timeframe. In February with the introduction of the improvement plan the missed bins were able to be rectified in the timeframe as there were less missed bins overall. From May onwards there is a marked drop in performance as Veolia have not had enough drivers to maintain the frontline services, the use of agency drivers leads to an increase in missed bins due to lack of knowledge.

### LBC Missed Collection Recovery June 20 - June 21



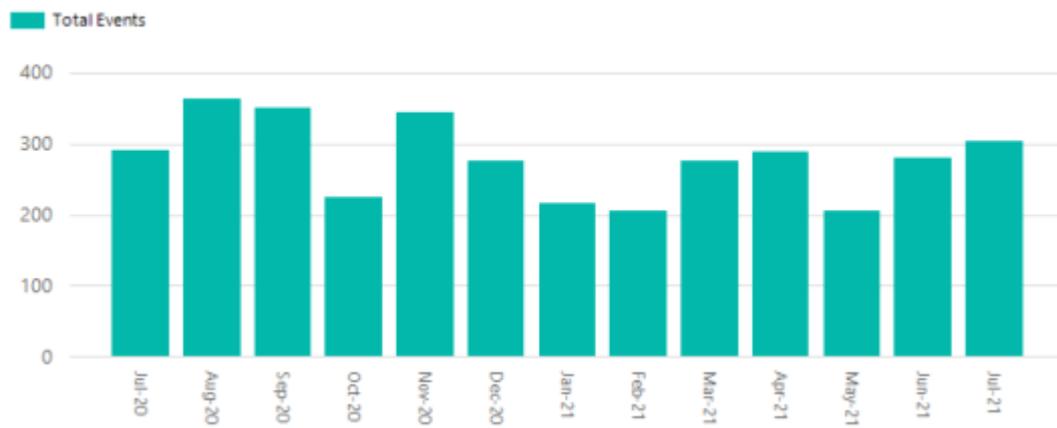
## Tonnages



## Street Service

- 5.9 The street cleansing service was used to support statutory waste collections throughout Covid and the driver shortage, despite this Veolia has managed to provide and maintain the service with SPI's consistently being met.
- 5.10 The streets below an acceptable grade of cleanliness can be seen to increase from June onwards, this is a direct result of the HGV drivers that have been supporting collections.
- 5.11 Grades of Cleanliness are defined within the Code of Practice for Waste and Littering and range from grades A (best) – D (worst) and further embedded within Contract KPIs and SPIs which form part of the performance management framework reported on a monthly and quarterly basis.
- 5.12 Littering in the borough remains an ongoing and increasing problem and communications and actions are delivered by the Don't Mess with Croydon campaigns supported by robust enforcement actions. Growth of the Street Champion initiative detailed in this report has generated significant value in terms of local and community involvement to tackle littering and a significant and ongoing bin infrastructure programme delivered throughout 2021 in our parks and on our highways.
- 5.13 It should also be noted that highways and parks based recycling litter bins contain over 80% non-recyclable items and is therefore not suitable for recycling.

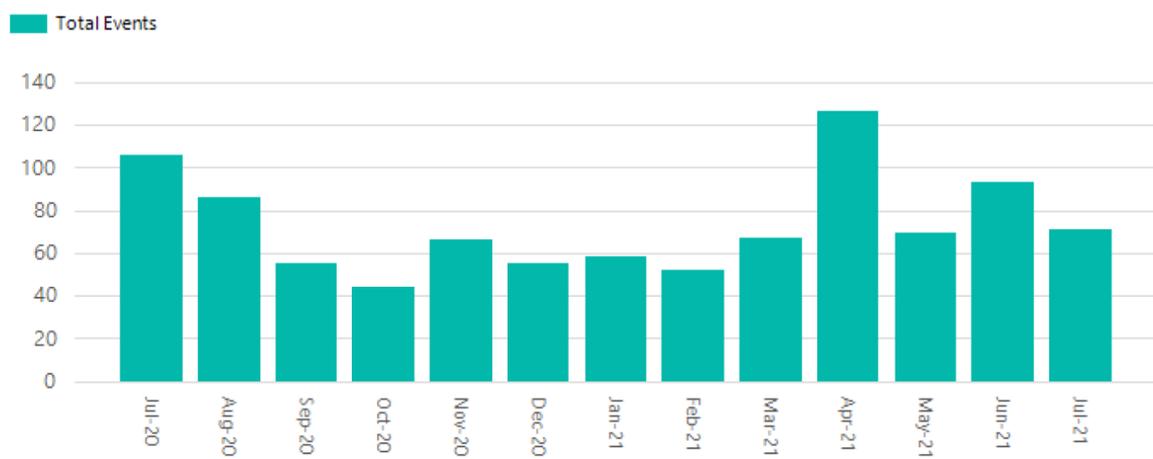
Street Below Grade



## Litter Bin emptying

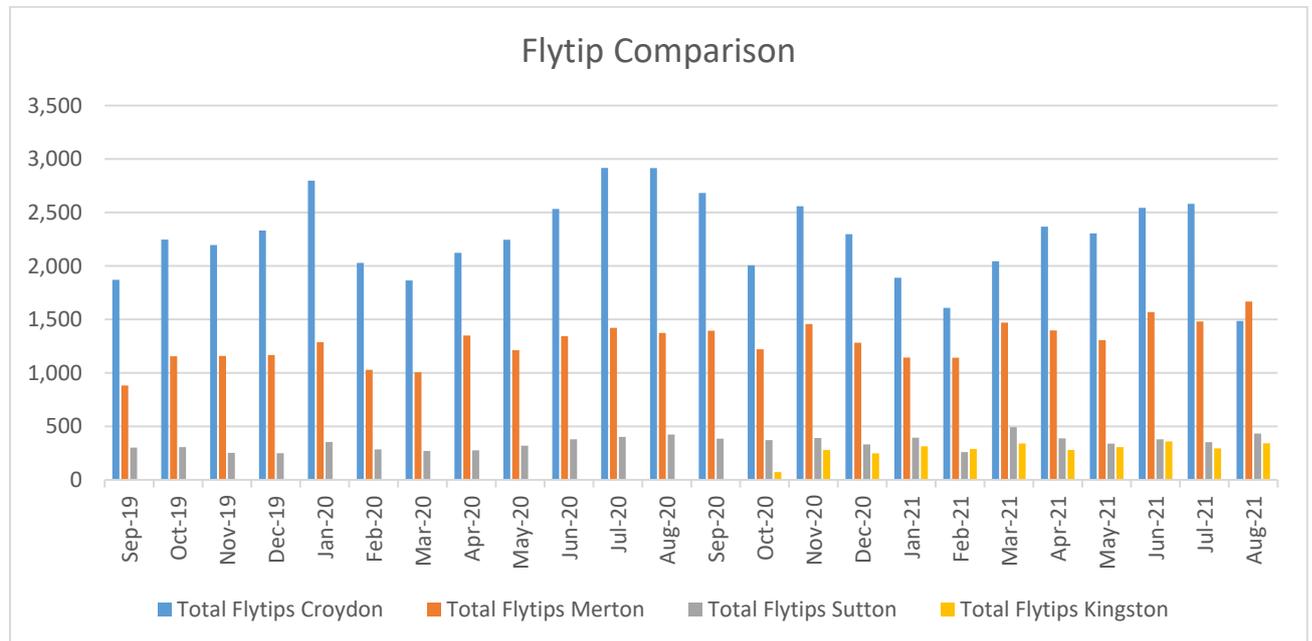
Litter bin provision and emptying performance continues to increase

Litter Bins



## Flytips

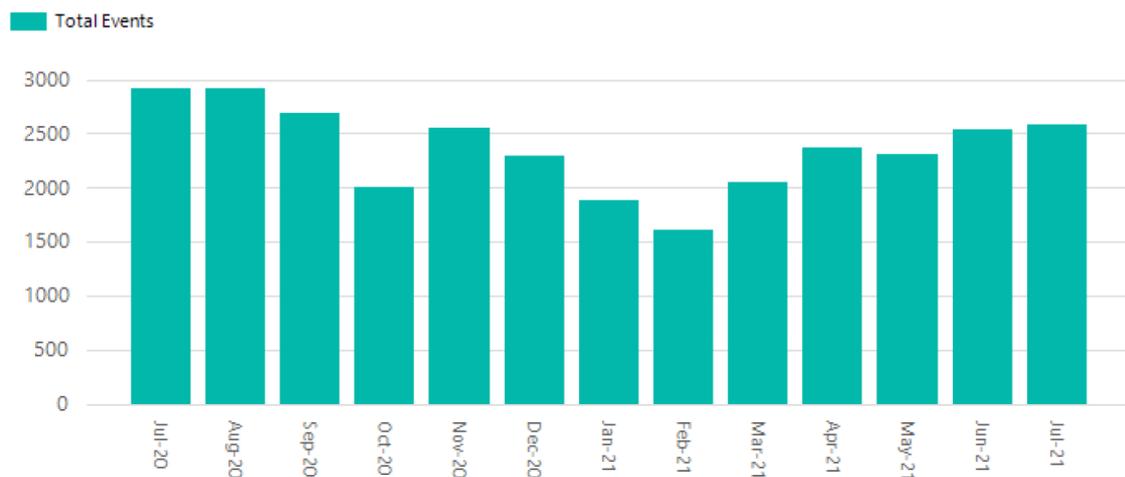
Flytipping instances across all boroughs in the SLWP region



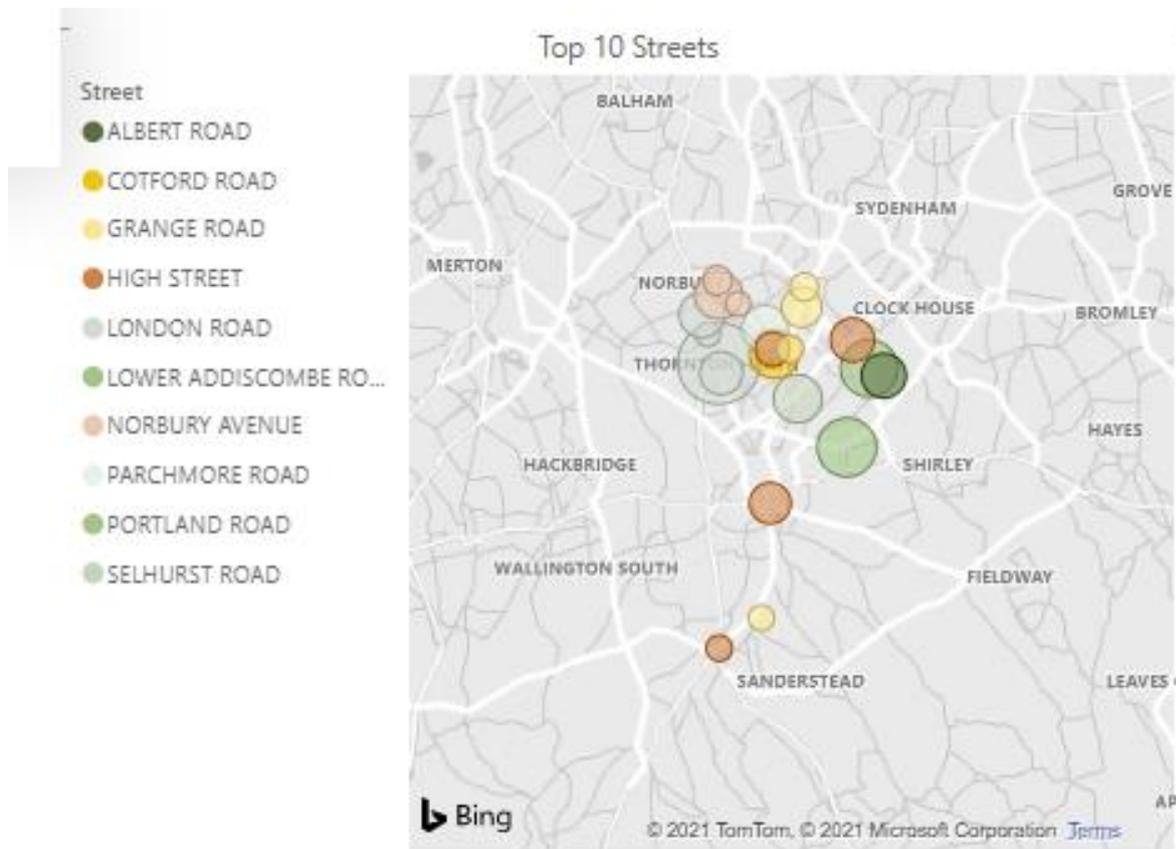
## Croydon

5.14 The flytips recorded in Croydon are counted by the number of reports received. To report a flytip the public or the waste services team (including NSO's) report the flytips through the Don't Mess with Croydon app. (The flytips collected by Veolia operatives who see them and collect them while on their round do not get recorded) As the public were not out from February 2020 the figures reported dropped significantly and the reports follow the lockdown pattern of 2020. Fuller monthly and quarterly flytip data is appended to this report

### Flytips

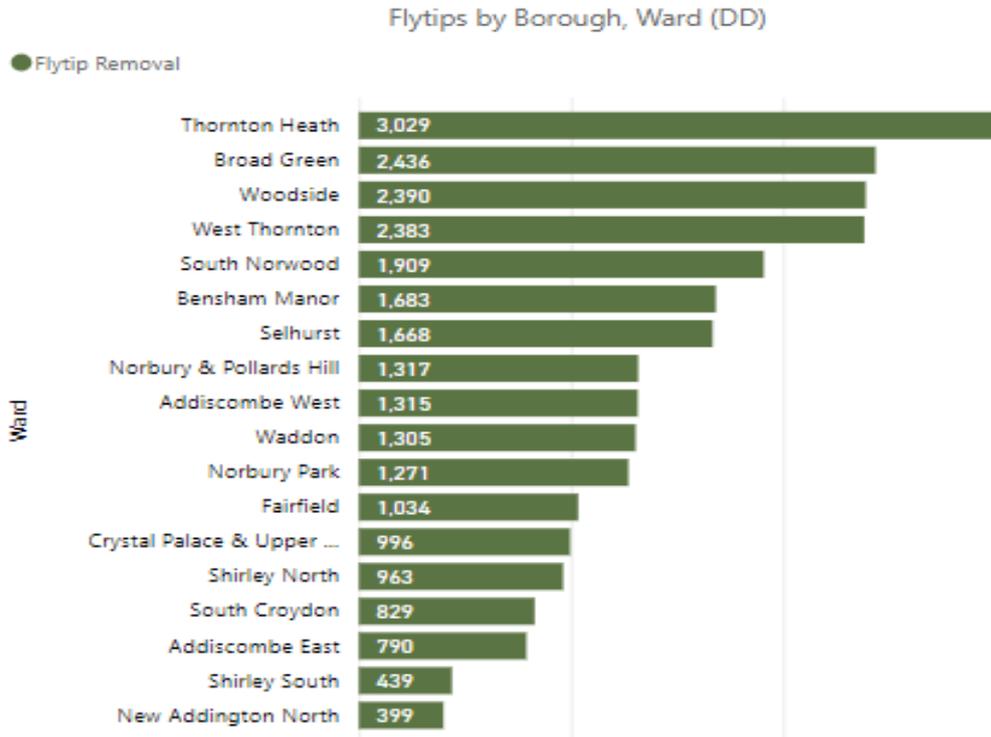


5.15 The below heatmap shows the streets that had the most recorded flytips of 2020, the North of the borough, as more densely populated than the south does tend to have more street cleansing issues. The interrogation of such data allows us to focus cleansing, waste removal and enforcement actions and resources to ensure identified streets and locations are kept clean and free of waste whilst ensuring that enforcement action is taken against businesses, residents and members of the public illegally depositing wastes and litter on the public highway.

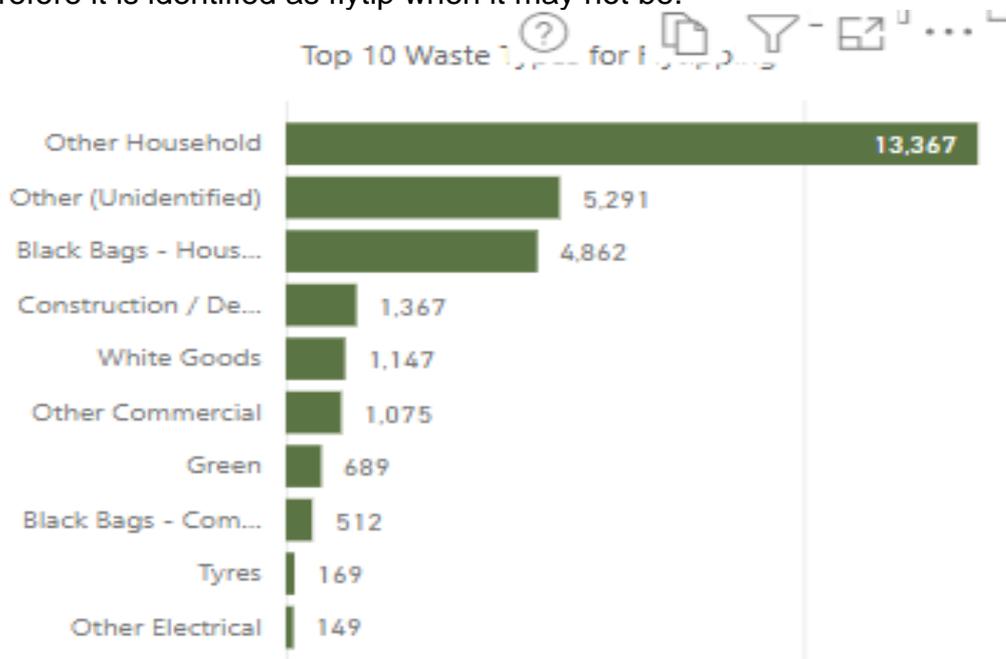


Flytips by Borough, Ward (DD)

5.16 The flytip by Ward also reflects that the North of the borough has the highest number of flytips.



5.17 The waste types recorded as flytips are shown below, it shows that household waste is the most commonly recorded waste type. This is a trend that has been seen in previous years and is not due to lockdown. The flats above shops project that is scheduled to start in early 2022 will allow the differentiation between true flytips and resident who live in these properties but have no containers to dispose of waste, therefore it is identified as flytip when it may not be.



5.18 All flytip data has been drawn from LBC reporting mechanisms and further supported by DEFRA's 'Flycapture' database which provides detailed flytipping information for all local authorities in England. Direct comparison with other local authorities not in our region may be misleading due to differing demographics, levels of deprivation, how other LAs define a flytip, road networks and the strength of enforcement actions.

## 6. Enforcement Actions

### Fixed Penalty Notices (FPNs)

- 6.1 The NSO and EEO teams issue FPNs for littering and fly tipping. The number of FPNs issued has reduced significantly due to the reduction in staffing levels over the past year. The biggest issue facing staff from issuing FPNs is the lack of evidence found within fly tips and staff have been instructed to conduct visits to local properties to engage with residents to identify the offenders. In recent years, the team has collaborated with Veolia supervisors to encourage their operatives to capture and supply evidence found within fly tips they are tasked with clearing.
- 6.2 Extensive CCTV deployment in hotspots has resulted in the issuing of hundreds of FPNs.
- 6.3 The number of large scale fly tips has also been reduced due to the teams excellent work in this area. The team has seized and crushed 54 vehicles in the past five years which were linked with large scale fly tipping in the borough. Of these offenders, one was handed a 12 month jail sentence and another was given 240 hours community service at Court.

	2017	2018	2019	2020	2021 (to date)
Littering and Flytipping FPNs	820	927	608	867	244

### Community Protection Warnings (CPW) and Community Protection Notices (CPN)

- 6.4 NSO's are also tasked with investigating a service request in the first instance. CPW's are used to resolve a number of issues such as front garden waste, vegetation cut back, nuisance issues such as vehicle repairs on the highway to name a few. A vast majority of issues are resolved once a CPW is issued however the case is escalated to the EEO team if there is noncompliance to the instruction. The EEO team then may issue CPNs and progress to prosecution if they are not complied with.



## **7. Challenges and Successes**

7.1 Veolia with support from the council was able to deploy all frontline services and maintain services to residents throughout 2020 and 2021 despite very challenging circumstances. Residents had minimal disruption and most collections were made on schedule. The creation and proactive management of a Covid specific Business Continuity Plan backed up by robust risk assessed service assessments ensured that services were maintained during this challenging period. The same level of focus has since been given to the impact of the national driver shortage and actions by the council has ensured that all collection services are carried out in full each week and unlike many other local authorities, has meant that none of our collection services have had to be suspended to date. Communications are updated on a daily basis across all our messaging platforms to ensure the residents are kept fully aware of service changes and locations affected by late or disrupted services.

### Improvement Plan

7.2 The changes LBC made to the management and focus of the service improvement plan in April of this year was showing real promise at being able to deliver improvements in the service. The driver shortage has hindered this, while the ability to attract and maintain HGV drivers remain the improvements are on hold. Veolia are currently able to complete all collections by the end of the week but not all are to schedule with delays to services.

7.3 The Plan also allows LBC to apply or withhold funding across several SPIs and KPIs with the intention to reward service improvements and performance. KPIs and SPIs can be changed on a quarterly basis to focus on new and emerging performance issues and to this end, Container delivery performance was included as a fundable indicator for the reasons stated in 2.10.10 which will allow LBC to withhold funding if performance standards are not met

### Flats above shops project

7.4 In partnership with our contractor (Veolia) Croydon are looking to roll out a flats above shops recycling project. The project aim is to give flats above shops the ability to recycle dry material, where currently all the recycling produced in these properties cannot be recycled by kerbside means. Residents will be provided with sacks for mixed recycling and refuse, the sacks will be collected weekly and provided residents with the same disposal capacity as kerbside properties. The residents will be provided with a 6 month supply of sacks which will be delivered to their properties. The recycling will be all materials we currently collect in one sack (currently paper, card, plastic, can and glass ) with the exception of food waste. The roll out will be supported by a robust advertising and door knocking campaign to advise residents of the scheme, how to use the sacks provided and any other information they require. The aim is to remove black sacks being left on the highway thereby improving the streetscape of our high footfall roads.

## Street Champions

- 7.5 The advancement of Croydon's Street Champion initiative and actions taken by Veolia to support its CSR regimes have also greatly assisted services during the past 3 years. Since the initiation of the scheme in 2018 the popularity of the scheme has grown each year and we currently engage with 630 Street Champions. Equipment that we use for the Street Champions has been previously jointly funded through the council and Veolia but by Veolia alone in this current year.
- 7.6 Waste from clean ups, litter picks and events are collected by Veolia and our own parks cleansing teams.
- 7.7 The table below demonstrates the growth of the initiative and it continues to progress.

Year	Number of Street Champions	Number of clean up events	Number of organised litter picks
2018 - 19	350	138	1300
2019-20	404	509	500
2020-21	582	235	2000
2021 - date	630	103	958

## National HGV Driver Shortage

- 7.8 On 21st June Veolia advised that its local managers were finding it more difficult to source drivers as a result of the compound impact of the pandemic on driver training coupled with the loss of the European driver pool as a consequence of Brexit.
- 7.9 The SLWP response to this 'early warning' detailed additional local actions to help manage the impact over the holiday period. This included requiring Veolia to engage with all boroughs to update their business continuity planning, the provision of daily resourcing information by 9am and status reports by 5pm detailing where collections have not been completed and the planned resolution measures. These reports are key to planning and updating communications to residents. The SLWP also asked Veolia to complete an HGV requirements table listing the daily number of drivers required, permanent staff available, on leave/sick, redeployed HGV staff, agency requirements and mitigation measures. Croydon foresaw this eventuality and had already proactively updated its Business Continuity Plan with Veolia in early June and have been working to its requirements and trigger points since then. These initial measures include:-
- LGV drivers from the cleansing section were refocused onto waste collections.
  - VES management and supervisory staff redeployed as waste collection drivers
  - Communal collections of waste and recycling were rescheduled to the weekend and collected in 1 pass (co-collected)
  - Full details of the driver attraction and retention measures VES has in place are further detailed in the appended presentation.
- 7.10 With the above measures in place, at present no LBC collection service has had to be suspended.

## Bin Deliveries

- 7.11 To assist in the delivery of core services during the imposed COVID lockdowns throughout 2020 and in line with the agreed COVID Business Continuity Plan, all bin deliveries were suspended for a six month period. This created a significant backlog of deliveries and an increase in the number of complaints relating to this service area. Backlogs of bin deliveries have been reducing in 2021 with VES delivering in excess of 4000 containers each month (against a contractual requirement of 2,400) but this again has been impacted by the national driver shortage, meaning resources being moved from this service to support core and statutory collection services. At present, residents can expect to wait up to 10 weeks to receive their new or replacement container and LBC are managing this via the performance funding available to VES, effectively allowing LBC to withhold funding for under performance.

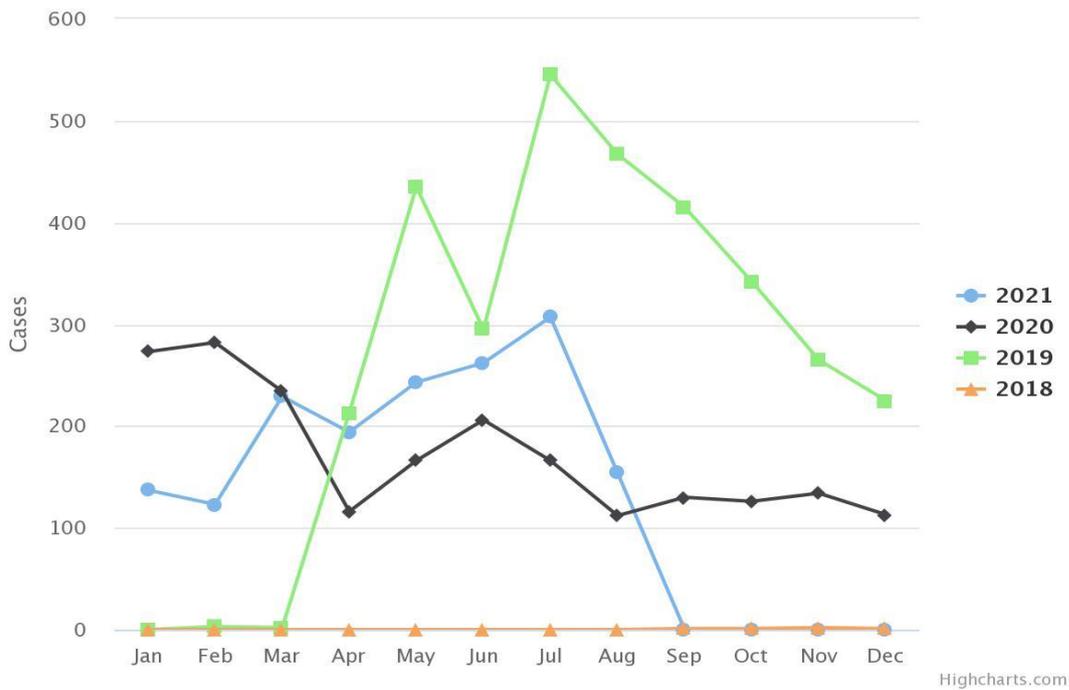
## **8. Client Management Approach**

### Contract Monitoring and SPI

- 8.1 Regular monitoring takes place of contract. This is done both locally through contract meetings and with the SLWP across all its levels (operational, strategic and political) of governance to ensure the partnership is delivering the desired outcomes. This continual monitoring of the contract against the targets allows for issues to be spotted quickly. The council officers have developed excellent working relationships with both the contractors' collections and streets teams to ensure issues can quickly be identified and rectified.
- 8.2 The SPI's for the contract were renegotiated in 2020 as part of the deed of variation and the new ones have been in place since September 2020. These allow Croydon to weight the SPI's that are most important to service delivery for the next three months. The issues are identified through contract monitoring and complaints monitoring and the relevant SPI's are weighted. This allows Veolia to direct the resources accordingly and drives continuous improvement
- 8.3 Analysis of contract monitoring allows us to better inform the contractors and the SLWP partners of new and emerging risks and areas of concern on a local and regional level. Robust data allows us to identify both good and bad resident and contractor behaviours down to a street level and allow us to target communications, training and service improvements at a local, ward based level.

## **9. Complaints**

- 9.1 From mid-2019 there was a positive downwards trend in complaints as the service was steady and the contract monitoring was managing the issues and resolving complaints. There was a slight increase in Jan/Feb 2020 which is expected due to Christmas collections catch up. The cases dropped significantly for the rest of 2020, especially over the first lockdown. In 2021 there has been a steady increase in complaints, to counteract this the SPI's were used as a tool to driver performance. In Q1 and 2 months of Q2 Veolia steadily improved the collections performance, unfortunately the driver shortage has led to a decline in performance which Veolia are working to counteract.
- 9.2 The split of complaints is 90% are for collections and only 10% are for streets issues. Additional monthly and quarterly complaint data is appended to this report



**Customer satisfaction surveys**

9.3 Veolia carry out regular customer satisfaction surveys, the last survey was in 2019 (details attached in Appendix 1). A survey was due to be conducted in 2021, this was delayed as the communication plans were put back a year as no activities could take place the previous year.

**CONTACT OFFICER:** James Perkins – Head of Environmental Services 07707

**APPENDICES:** Appendix 1 – Powerpoint presentation to be presented at the meeting  
 Appendix 2 – Recycling and Reduction Plan  
 Appendix 3 – Service Performance Improvement Plan

**BACKGROUND DOCUMENTS:** None