

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	24 MAY 2023	
REPORT TITLE:	Waste and Street Cleansing Service Commissioning approach for service delivery (Re-procurement Waste and Street Cleansing Service)	
CORPORATE DIRECTOR / DIRECTOR:	<i>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery</i>	
LEAD OFFICER:	<i>Steve Iles, Director of Sustainable Communities</i>	
LEAD MEMBER:	Cllr Scott Roche - Cabinet Member for Streets & Environment	
KEY DECISION?	Yes	0523EM – Meets Key Decision Financial Criteria of over £1m
CONTAINS EXEMPT INFORMATION? <i>(* See guidance)</i>	YES	<p>Public with exempt Confidential Appendix A – Financial assessment</p> <p style="text-align: center;">Grounds for the exemption: Exempt under paragraph(s) 3 of Schedule 12A of the Local Government Act 1972 and the public interest in withholding disclosure outweighs the public interest in disclosure.</p>
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1. The Mayor’s Business Plan includes a focus around making our streets cleaner so that Croydon is a place that residents and businesses can feel proud to call home, and a commitment to review the street cleansing and refuse collection contract.
- 1.2. The purpose of this report is to seek approval by the Executive Mayor in Cabinet to re-procure the waste, recycling collection and street cleansing services following the decision by the Exec Mayor in Cabinet in Nov 2022 to NOT extend the contract with Veolia Environmental Services UK following the expiry of the initial term on 31st March 2025.
- 1.3. Croydon Council operates waste and recycling services for every household in the borough through its contract with Veolia. This contract includes waste and recycling collections, footway winter maintenance, vehicle maintenance and street cleaning. It

was procured by Croydon on behalf of the four partner boroughs in the South London Waste Partnership. The contract commenced in April 2017 and the initial eight-year term expires on 31st March 2025.

- 1.4. The partnership Boroughs had the option to extend the contract, but all agreed not to take up the option.
- 1.5. This report notes the best value assessment of the three main service delivery models for both waste and recycling collection services along with the street cleansing service both to commence in April 2025.
- 1.6. The re-procurement is necessary due to legal risk regarding Veolia's proposed conditions for extending the existing contract. A new commissioning approach will also allow the council to evaluate the waste collection and street cleansing arrangements, help the local environmental quality and reduce fly tipping whilst helping increase pride in Croydon.
- 1.7. This report presents the Councils approach to reshape the future waste collection and street cleansing service in line with the Executive Mayor Business Plan and delivering a service in which Croydon is a place residents and businesses can feel proud to call home.
- 1.8. The report notes the key Mayoral pledge, in improving the quality and appearance of the street scene and holding contractors to account and delivering value for money.
- 1.9. These services are directly linked to Mayors Business Plan 2022-2026 'Make our streets and open spaces cleaner so that Croydon is a place residents and businesses can feel proud to call home'
- 1.10. The report concludes that the best value option is to re-procure these services The new commissioning approach will also allow the council to improve the waste collection, recycling and street cleansing within an agreed financial parameters including all revenue and Capital cost over the life of the contract along with a review of the current contract management arrangements currently undertaken by the South London Waste Partnership (SLWP) with the aim of implementing a focused Council managed Client team incorporating all contract management functions relating to these high profile services.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet, , is recommended:

- 2.1** To approve the procurement strategy set out in this report for the procurement (via a Competitive Dialogue process) of waste and recycling collections, footway winter maintenance, vehicle maintenance and street cleaning, for a term of 8 years, with an option to extend for a further two periods of 8 years each by mutual consent for a maximum contract value of £432m over the maximum contract term of 24 years
- 2.2** To agree that better and more economic options for the provision of a Clinical Waste Service will be explored as a separate procurement
- 2.3** To agree that the procurement of new recycle off-take contracts for the Council's domestic recycling material will be explored through the South London Waste Partnership and that any proposed commissioning of such services will be subject to the Council's governance process.
- 2.4** To note the findings from the recent resident engagement survey and focus groups to help shape the design and specification of the new service.
- 2.5** To note that the final specification to be issued with the Invitation to Submit Final Tenders (following the discussions with bidders under the Competitive Dialogue process) will be subject to the approval of the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery in consultation with the Executive Mayor and Lead Cabinet Member for Street and Environment
- 2.6** To note that a report will be presented to Cabinet in June 2024 highlighting the outcome of the proposed procurement along with recommendation of Preferred Bidder and their proposed fully costed solution. This will include details of the proposed governance arrangements to manage the contract supported by the resourcing levels for the monitoring of the services performance

3 REASONS FOR RECOMMENDATIONS

- 3.1** Based on the options appraisal and reviewing the feedback from 'soft market testing' it has been determined that the most viable service delivery model is to re procure these services taking into account the changes in the commercial market and their reluctance to take financial risk on processing of recycle material along with guaranteed income share from the sale of material.
- 3.2** The contract requirements & performance to date have not fully met the evolving needs of our residents.
- 3.3** Therefore, it is appropriate for the authority to further use the opportunity of re-procurement to ensure contractual performance is matched to the needs of residents going forward.
- 3.4** The contract length has been chosen to reflect the significant capital investment cycle for the fleet of vehicles which is typically 8 years for Refuse Collection Vehicles.

- 3.5** The contract will allow for an annual review of the contract and clauses for the Council to intervene if performance is not as agreed. If the contractor performs it is worthwhile allowing for agreed extension(s) rather than having to reprocure the services.

4 BACKGROUND AND DETAILS

- 4.1** The South London Waste Partnership (SLWP) was formed in 2003 between the boroughs of Croydon, Kingston, Merton, and Sutton and has a proven record of providing improved and more cost-effective waste management services through the procurement of complex waste disposal treatment, recycling and Household Reuse and Recycling Centre contracts. The SLWP itself is not a legal entity and thus procures its contracts through one of the borough members of the Partnership in this case, Croydon Council.
- 4.2** In 2017 the SLWP procured the Phase C - Contract for waste and recycle collection and marketing, winter maintenance, vehicle maintenance and street cleaning (Lot 1) on behalf of its four borough partners. The contract was awarded to Veolia (Environmental Services). The new contract saw all boroughs adopting the same collection methodology, fortnightly residual waste collection, fortnightly paper/card collection, fortnightly dry mixed recyclable collection (glass, cans, plastic), weekly food waste and a charged for fortnightly garden waste service. Some differences remain in response to localised needs and demands, such as flats above shops, communal properties, street cleansing and so on. Other areas, such as winter maintenance, are also services that are not provided to all boroughs under the Phase C Contract.
- 4.3** The service resulted in all the SLWP Boroughs being within the top 7 recycling performers of the 33 London Boroughs and delivered significant collection and disposal savings.
- 4.4** The current contract, also referred to as 'Phase C', was procured by Croydon on behalf of the SLWP partner boroughs as lead and awarded to Veolia (Environmental Services). The initial term of the Phase C Contract is 8 years with an expiration date of 31st March 2025. Any extension must be agreed by both parties to the contract. Croydon as lead and the other SLWP partner boroughs entered into an Inter Authority Agreement (IAA) to manage the relationship between the partners in respect of the Contract.
- 4.5** The annual value of the Phase C Contract across the SLWP is c £30m and the contract continues to be held and administered by Croydon.
- 4.6** At the Cabinet meeting on 24 November 2022, The Mayor in Cabinet agreed that the current waste collection and street cleansing contract with Veolia ES UK is not extended following expiry of the initial term on March 31st, 2025. In addition, agreed that further work was to be undertaken and alternative options for the provision of different delivery models. Key Decision No 6822EM
- 4.7** The current contract is an output specification based on a series of method statements and managed through the SLWP. The authorised officer for the contract is the SLWP Partnership Contract Manager covering all 4 partnership authorities. They are directed by the Senior Management Group which consist of the appropriate Director from each borough. Regular contract meetings are scheduled with SLWP, the Borough Leads

and Veolia. In practice these have not been as robust as had been envisaged. Croydon now directly monitor and have an element of self-determination; it is not consistently applied across the 4 boroughs as such the decision of each Borough not to extend with Veolia and each to have their own independent arrangements for any new contract for these services.

4.8 Waste and recycling collection and street cleansing are Universal Statutory services that the Council is required to provide for residents. This report sets out a revised approach to delivering these services from April 2025.

4.9 The SLWP will continue to deal with the disposal of waste, processing of recyclate and the treatment of food and green waste. In parallel therefore the SLWP is in the process of setting up a series of contracts to take the recyclate and deal with its processing.

4.10 CURRENT SERVICE PROVISION

4.11 The Council's waste collection, street cleaning and winter maintenance services are currently contracted to Veolia. This decision was taken by the Council in 2016 (Key Decision Number 20/16/CAB) to deliver financial savings, increase recycling performance, maintain satisfaction, and provide over one million residents with a kerbside recycling service. The contract commenced on 1 April 2017 for an eight-year initial term, with the option to extend for a further two periods, each of eight years.

4.12 The contract at its inception saw all boroughs adopting the same collection methodology for the core areas of the services, including fortnightly residual waste collection, fortnightly paper/card collection, fortnightly dry mixed recyclable collection (glass, cans, plastic), weekly food waste, a charged fortnightly garden waste service and commercial waste. Some differences remain in response to localised needs and demands, such as flats above shops, communal properties, street cleansing and so on. Other areas, such as winter maintenance, are also services that are not provided to all boroughs under the Phase C Contract.

4.13 The existing contract includes the following services:

- Collection of residual, recycling, food, and green waste
- Commercial waste collection/disposal
- Clinical waste collections (domestic)
- Gully maintenance
- Winter maintenance
- Street cleansing
- Waste transfer station operation (at Garth Road in Merton and Stubbs Mead in Croydon)
- Recycling receipt, bulking and haulage
- Processing of recyclates
- Bulky waste collection and treatment
- Vehicle maintenance
- Communications

4.14 Infrastructure – Both Croydon and Sutton's collection services currently operate from the Stubbs Mead Depot in Croydon.

- 4.15** Our neighbouring boroughs which are part of the South London Waste Partnership (SLWP) have each decided to commission these services individually in order to address localised preferred options on service delivery models and supporting time frames. Given the geographical size of the Borough of Croydon the risk is minimal and our scale of economy and infrastructure will be of interest to the market
- 4.16** Given the different priorities and preferred approach across the South London Waste Partnership Boroughs it has been agreed that Croydon Council will directly develop and manage its own procurement of these services along with any subsequent award of contract. Given the geographical size of Croydon and in borough assets such as depot and transfer stations we are confident that this will be an attractive contract and generate a competitive interest from the market.
- 4.17** Commercial waste is a statutory requirement to be provided by the Council if requested by a commercial venture operating in the Borough. There is no exclusivity and businesses are not obliged to have a Council provided commercial waste collection service and as such they are free to select their own preferred supplier.
- 4.18** As a statutory requirement the specification will need to include the provision for a commercial waste service in which the service provider undertakes the responsibility of the management and operational service, noting that the individual commercial waste collection contracts remain in the ownership of the Council.
- 4.19** The service will explore future delivery options for the collection of domestic clinical waste (sharps and infectious / offensive waste) through existing frameworks and work with external partners including NHS England to minimise the volume of clinical waste collections currently being undertaken.
- 4.20** The Council need to provide best value, increase recycling performance, drive waste minimisation, improve resident satisfaction in waste collection and street cleansing services, respond to the challenges arising from new legislation and Government waste consultations on the implementation of this legislation, and also to reduce the carbon impact of these services. This cannot be achieved without change. The following provides further detail around the challenges identified and how each feed into and supports the recommendations contained within the report.

4.21 **LEGISLATIVE DRIVERS**

- 4.22** The Environment Act 2021 is a key piece of legislation for delivering the commitments made in the 2018 Government's 25 Year Environment Plan to 'protect and improve the natural environment in the UK', and for taking forward and legislating the measures and proposals outlined in the Resource and Waste Strategy (2018). The detail of the policy changes is still not fully known but the following are expected to impact the Council's services in the next five years:

- **Consistency in Collection** - this requires the Council to collect in a segregated way a series of core materials: plastic, glass, paper/card, metal, and food waste. With the exception of flats above shops which do not have a food waste service, the Council already does this.

- **Deposit Return Scheme** will add a small charge for the packaging of an item (such as a bottle), which is refunded when the item is recycled via a dedicated recycling scheme (usually in a shop).
- **Extended Producer Responsibility** - this is the Government's approach to move the full cost of collecting household waste from the taxpayer to producers. Fees are based on the recyclability of products and the approach aims to ensure greater quantities of recyclable waste are reprocessed into valuable, high quality secondary resources.
- **Plastic Packaging Tax 2022** introduced a charge on producers for any plastic packaging that does not contain at least 30% recycled plastic content.

4.23 These proposals will have an impact on the quantities and value of recycling the Council collects, potentially as much as a 50 to 70% reduction in materials collected. This will impact the cost of running services.

4.24 The waste services the council runs must be in "general conformity" with the Mayor of London's London Environment Strategy 2018, which also requires the Council to have a Waste Reduction and Recycling Action Plan. Croydon is already achieving 38.72% recycling rate and the Mayor's targets for 2025 are for 50% recycling rate. The council trend is mirroring the national trend of a reduction in waste tonnage and consequently this is seeing a reduction in the percentage of recyclable waste being diverted from the general waste stream. Croydon's recycling rates for 21/22 remains in the top quartile for London. Croydon is also diverting 100% of waste from landfill.

4.25 CARBON NEUTRALITY

4.26 Climate change is the single most important challenge facing us all. Our response to the climate emergency will form a key element of the Council's focus, with cross-cutting and pan-departmental themes that align with each of our key objectives.

4.27 The Council declared a climate change and ecological emergency in July 2019 and Cabinet agreed that the Council would become carbon neutral by 2030. The council also agreed a Carbon Neutral Action Plan in February 2022

4.28 Local Council recognises that the Climate Emergency is a significant threat to our planet and accepts that it needs to both act and provide leadership at the local level to mitigate the effects of this global crisis. It is also the Council's ambition to play a key leadership and influencer role at both a regional and national level to ensure that policies are in place to deliver meaningful action at the scale and pace that is required.

4.29 Achieving decarbonisation in the waste service will require looking at the carbon emissions of every part of the waste journey - from material production to disposal routes

4.30 There is a need to ensure that the chosen delivery model enables the Council to nurture civic pride and 'make our streets and open spaces cleaner so that Croydon is a place residents and businesses can feel proud to call home' along with ensuring that

the contract is flexible and can adapt to changing regulations along with the changing needs of our residents.

4.31 The design of our waste and recycling collection service will have a key role in contributing to the Council Emergency Climate Action Plan along with ensure compliance with our Waste Reduction and Recycling plan (RRP). This includes but not limited to:-

- Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging.
- Maximise recycling rates.
- Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants).

4.32 To achieve this the council will need to review current industry recommendation and invest in alternative fuel technology for new fleet of waste collection service, specialist Heavy Goods Vehicles, along with assessing the potential use of electric vehicles for the smaller fleet used on the street cleansing service.

4.33 It is likely to mean changes in the design, funding and operation of services and will require innovation from the market and technological solutions.

4.34 EXTERNAL SPECIALIST ADVICE

4.35 The Council continues to work in partnership with SLWP to develop a base specification, which is more detailed and robust than the current contract and it has been tested in use in other councils. The base specification is being modified to meet the needs of Croydon and a draft of this is currently with the GLA for agreement to check conformity with the London Environment Strategy, to enable the procurement to progress.

4.36 POTENTIAL SERVICE DELIVERY MODELS

4.37 The Council has used this as an opportunity to review the current service offer and operations with Veolia, and to start assessing the impact on costs for future services. This includes looking at the borough's ambition to deliver a zero-carbon waste service, future demand for waste services, changes in the industry and what the private market looks like. The Council will need to consider how resident satisfaction with waste collection and street cleansing services is not affected by necessary changes arising from new legislation and its implementation.

4.38 In order to inform officer recommendations a high-level assessment of the costs, advantages, and disadvantages of differing service delivery options on a 'like for like' basis using the same specification for each service delivery model.

4.39 The commissioning options appraisal for the collections and street cleansing service is a complex one and needs to be considered against a backdrop of financial pressures, legislative change, technological development, changes in the private sector appetite to risk and comes at a pivotal point in the Council's carbon reduction agenda

4.40 In reviewing the main different service delivery models the service have considered 3 main options for the provision of a new waste and recycling collection service combined with a new street cleansing operation: -

- Fully Commissioned service – service delivered by a third party (outsourced)
- Direct Service Organisation (DSO) – (In House provision)
- Local Authority Trading Company (LATC)

4.41 A summary of each model is outlined below, which provides a high-level summary of each of the three delivery models and the advantages and disadvantages for each option.

4.42 In reviewing the financial assessment undertaken by our specialist waste consultant the financial differential between each model is not a key determining factor as any advantage gained through lower over heads and pension liability from an outsourced model is offset against profit margins and risk pricing

4.43 DETERMINING BEST VALUE

4.44 In reviewing the best value, the service has considered the optimal combination of financial cost, recycle income / profit share, Service delivery including set up and mobilisation, service expertise, Changes in legislation and legal compliance. A summary of this rating can be seen below in table 1 , based on the current service applied to each option.

	Contracted Out	Direct Service Organisation	Local Authority Trading Company
Finance – set up Cost	RED	RED	RED
Finance – Recyclate Income risk pricing	AMBER	AMBER	AMBER
Service delivery , set up and mobilisation	AMBER	RED	RED
Service expertise	GREEN	AMBER	AMBER
Legislation Changes	GREEN	GREEN	GREEN

Legal	GREEN	GREEN	GREEN
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Table 1

- 4.45 Cost of Service** : All options have an anticipated increase in costs, returning to the market with a new specification will enable the Council to make service design decisions in order to minimise the increase in cost, but it is still anticipated that the services will not be deliverable within the current budget. It is important to note the current services were procured in a different commercial context, and since the award to Veolia in 2016 there have been significant changes in recycling markets, in the private sector, and since COVID significant changed the way we live and work
- 4.46 Income risk share** –There are significant changes to legislation, the private sector, and following a few years of market volatility, a reduction in the appetite for risk. As such all delivery models will see the cost of our chargeable services and subsequent income held in totality by the Council. It is possible to carve out of recycle processing under a separate contract which will able the Council in partnership with SLWP to offer a shorter contract period, reduce the exposure to the contractor, and therefore achieve reduced risk to the Council.
- 4.47 Service Delivery set-up and mobilisation** – This is rated green for the contracted-out solution as it would be undertaken by experienced service providers who are well positioned and experienced in undertaking the mobilisation of new services. DSOs and LATCo options are rated high risk, based on the like for like fully integrated services. The Councils is not currently set up with supporting structures to manage services directly so potential for considerable set up costs given need to secure senior management staff, central support services and new support contracts. Cost of this service option is unlikely to offer savings and there is no existing infrastructure for sourcing and managing specialist staff.
- 4.48 Service Delivery Expertise** – The outsourced elements of this assessment area are rag rated green as the private sector will have the service delivery expertise and the specialist knowledge to best deliver these services. Whilst it is entirely feasible that the Council could and may well already have some of this expertise, this is amber for the DSO and LATCo options as is unlikely that a small organisation will carry quite the same number of personnel with this expertise.
- 4.49 Legislation** - The risks from legislation are felt to be generally low and manageable as the key regional and national strategies support the Council’s ambitions to protect and improve the natural environment. Any changes to legislation will equally impact on all service delivery models as such each have been rated the same.
- 4.50 Legal** – with the contract extension not being considered as agreed by Cabinet in Nov 2022 all services deliver models can be explored and are feasible options to be considered when designing the new service. As such all options have been rated equally.

4.51 COMMISSIONED SERVICE (Recommended Approach)

4.52 The principal rationale for procuring an external provider is the benefit gained through technical expertise and business resilience. Additionally, market competition can assist in generating competitive pricing along with relative certainty on cost over the life of the contract subject to any agreed indexation.

4.53 Typically, the private sector can deliver a service at a lower cost than a local authority. Market competition can assist in generating price competitive solutions and gives the Council relative certainty on the cost of service over the life of the contract subject to inflation.

4.54 The commission model enables the Council to test the market and its innovation, technology, and proposed service delivery solution to ensure that these are maximised, and benchmarked against other suppliers.

4.55 Our ability to exploit these advantages will be determined by two key drivers: -

- The competitiveness of the Market at the time of the tender
- The structure of the contract and requirements set out in the service specification along with both the Councils and Contractors appetite for risk and any profit-sharing agreement.

4.56 DIRECT SERVICE OPERATION (DSO)

4.57 The option to bring the service in house is open to consideration by Cabinet as there is no legal requirement to retender these services as long as we can demonstrate 'best value' has been achieved.

4.58 The key strength to directly managing the services is the Council has full control and can adapt the service given a greater degree of flexibility as there are no contractual obligations or restraints on how the service is deployed.

4.59 Direct service models are traditionally more expensive due to the increase in corporate overheads and pension liability. The technical and logistical challenges in establishing a viable and high-quality in-house service provision are considered high risk at this stage as we would be required to gain significant specialist knowledge and skill sets in managing not only the daily operational deployment of the service but also the management of the Councils fleet maintenance along with ensure access to specialist agency workforce for the seasonal services.

4.60 In addition we would need to be able to quickly react / adapt the potential changes in legislation relating to the collection and processing of recyclable materials. In addition the service needs to ensure it has adequate business continuity plans in place and access to the wider employment market for both specialist and seasonal staff.

4.61 LOCAL AUTHORITY TRADING COMPANY (LATC)

- 4.62** This model requires the Council to set up a wholly owned company with an appointed corporate management team including Managing Director having oversight on the day to day delivery of the service.
- 4.63** There are inherent and increased risk in establishing a new LATCo prior to the commencement of the service in 2025. Delivering a service through a LATCo would mean the loss of benefit that comes from a national organisation including central corporate teams providing technical IT, HR and commercial trading agreements including scale of economy and buying power.
- 4.64** The primary advantage of a LATCo when compared with an In-House provision is the potential reduction in overheads and pension liability.
- 4.65** In summary this option would present insufficient benefit versus the risk of such a model particularly regarding staffing cost and stability of service along with the same risk of a DSO model due to all financial exposure would need to be off set by the Council.
- 4.66** A detailed summary of the ‘advantages’ and ‘disadvantages’ of each delivery model can be reviewed in Appendix 1 Options Matrix

4.67 FUTURE SERVICE SPECIFICATION

- 4.68** The specification for **waste and recycling** is based around the current service, ie
- Alternate collection of waste
 - Twin stream where possible and comingled, where it is not ie flats
 - Weekly food waste collection
 - A chargeable Garden waste service
 - A chargeable bulky waste collection service
 - Bin and container procurement, management, and delivery

The approach being adopted envisages through a process of Competitive Dialogue that the specification is refined and improved to explore potential improvements and efficiencies, together with experience of best practice. Through the process it is envisaged that bidder will set out how they will improve recycling rates, food waste capture and how flats and flats above shops can be better served.

It is planned to include the administration and operational management of a Commercial Waste Services within the specification and see if the market is interested in bidding to provide a service on behalf of the Council. Given that there are a number of established commercial providers operating within the Borough this may not be of interest and current market indications are that there is no appetite for risk including any guarantee income back to the Council.

- 4.69** Similarly, the specification for street cleansing, including:
- Street cleansing
 - Litter bin emptying and cleansing.

- Fly tipping
- Supporting community clear ups
- Footway sweeping
- Footway winter maintenance

- 4.70** Our intention is for this to form part of the scope of services being procured through Competitive Dialogue process to ensure the specification is refined and improved to explore potential improvements and efficiencies, together with experience of best practice. The premise will continue to be that streets are cleansed to Grade A and maintained at Grade B
- 4.71** The current fleet of vehicles were funded by the Council and should have a life expectancy of 18 months to 2 years at the end of the contract. During the Dialogue the prospective bidders will want to understand whether they will be expected to finance new vehicles or whether the Council would consider such financing as the Council is likely to have access to lower interest rates.
- 4.72** Provider models have been considered and options reviewed see appendix 1 which sets out the options of outsourcing, a Local Authority Trading Company and a DSO. There is not a great deal of differentiation between the 3 models in terms of cost, but the outsourcing model carries much lower risks for the council in terms primarily of HR and pension contributions and is thus the recommended option.
- 4.73** Procurement routes to market are general undertaken using an open or restricted tender process. However, given that the Council is seeking market input into the final specification, this is not a viable option for these services. One area of consideration is to use Competitive Negotiation , but given the level of development and refinement of the specification along with the number of uncertainties being introduced into the process the scope to accommodate such changes this approach does not provide the required level of flexibility , therefore a Competitive Dialogue process is recommended to enable the parties to resolve and finalise the specification and limit the exposure to uncertainties, particularly the upcoming regulatory changes.
- 4.74** Through the competitive dialogue route to market it is intended to seeks bidders' views on how the current specification can be improved. It allows tenderers to submit initial solutions after being successful at the selection stage. It envisages exploration during dialogue of the proposed solutions with bidders, and by its nature encourages the ongoing discussion to find the optimal solution through the "invitation to submit final bid" which will be on the specification the council determines after taking into consideration the discussions during the dialogue process.
- 4.75** During dialogue, the council plans to undertakes discussions with potential bidders in the areas listed below. This will help inform what the council determines for the final solution, which bidders will be asked to bid in the 'Invitation to Submit Final Bid" stage in early 2024.

- A performance mechanism to incentivise the contractor
- Implications of the changes being proposed by Government to regulations around recycling consistency, EPR, DRS etc
- Proposals to incentivise recycling performance.
- Incentivisation to ensure containers are returned correctly and avoiding damage to containers
- Improving recycling performance of communally collected properties,
- Improving the recycling performance for flats above shops
- Improving recycling collection of WEEE, textiles and batteries
- Increasing reuse and recycling of bulky household waste inc potential 3rd sector involvement
- Developing the Commercial waste collection service
- Enhancing leaf clearance, weed spraying and management
- Using street cleansing labour to assist in winter maintenance of footways
- Reducing the carbon footprint of the service and greenhouse gas emissions over the life of the contract, in a constrained financial environment
- Financing a replacement fleet
- Enhancing garden waste collections and the interface with Christmas tree collections

4.76 PROCUREMENT TIME FRAME

4.77 The provisional timetable for the Dialogue process is set out below:

Commissioning timetable		
November 2022	Cabinet decision on whether to extend the current contract with Veolia	Completed
September 2022 to April 2023 (ongoing)	<ul style="list-style-type: none"> - Development of the scope of service and specification, soft market testing and options appraisals for the future of waste and street cleansing services to inform the work set out in paragraph 8. - Undertake All Member engagement x 2 - Resident engagement - Development of the procurement strategy report 	On going
April 2023	Based on recommendations and member decisions, work commences on commissioning of services - whether reprocure, bringing back in house or development of a local authority trading company. If new procurement,	In Progress
April 2023	Contract Notices and DRAFT specification for waste collection issued to GLA	Completed (Reviewing feedback)
May 2023	Cabinet This report	
June 2023	Issue Prior Information Notice (PIN) to Market	
July 2023	Issue Invitation To Tender (ITT)	
Oct 2023	Dialogue with Bidders round 1	
Dec 2023	Dialogue with Bidders round 2	
March 2024	Final tender Submission	
April 2024	Evaluation	

May / June	Award report for Cabinet consideration	
April 2025	Service commencement and go-live	

4.78 Standard Selection questionnaire

4.79 The updated Standard Selection Questionnaire (SSQ) will be issued to shortlist a suitable pool of tenderers. This will include ensuring tenderer's financial viability, for the scale of contract. In addition, there will be project specific questions related to bidders' experience to help shortlist to a suitable number of bidders.

4.80 Evaluation Weightings

4.81 Tier 3 weightings for quality and price, and social value of: 60% Price, 40% Quality which will include Social Value. The tenders will be returned electronically via the e-tendering portal. The tender responses will be evaluated in accordance with the Tenders and Contracts Regulations to ensure probity, value for money and that the most economically advantageous providers chosen to deliver the service. The successful provider who achieves the highest combined quality/price/social value score will be awarded the contract

4.82 The quality sub criteria are being drawn up alongside the specification and will ensure that the bidders have the appropriate technical competency to perform the contract. This is likely to include criteria around operational delivery, resource allocation, staffing expertise and quality assurance.

4.83 Social Value

4.84 As part of the tender process the Council will clearly set out the minimum requirements it requires in relation to social value and encourage bidders to offer a social value solution that exceeds these minimum requirements. This will ensure that through the procurement process the Council receives social value offers with quantified delivery requirements. These quantified social value requirements will then become embedded in the contract through KPIs/contractual requirements. This will help ensure that the Council holds the Contactor to account to delivering its social value commitments through the life of the contract, to maximise the benefit for the borough of Croydon and its Residents

4.85 As the Council is committed to delivering on social value of 10% for the overall value weightings of the procurement price and quality will be applied within the ITT pack. The service provider will be expected to demonstrate their commitment deliver and/or adhere to the following social value requirements:

- Local supply chain opportunities
- Social Investment (Community voluntary engagement and sponsorship)
- Joint training and development (Work Experience placement opportunities for young people and those who have been on long term unemployment and school engagements)

- Employment opportunities for those who live in Croydon (via Croydon Works)
- Apprenticeship
- London Living Wage

4.86 The service provider will also be given an opportunity to offer alternative ways in which they feel they could contribute to the delivery of social value in the borough which may not be included in the above list.

4.87 Pricing

4.88 Potential bidders will be evaluated for price based on a fixed fee for the service with suitable adjustments for variations in service provision. All pricing methods will be captured in the pricing schedule / Cost Model supplied in the ITT. The Bidder(s) which submit the lowest rates together with the highest quality & social value presentation will receive the maximum score where applicable in relation to each of these scoring sections.

4.89 Abnormally low bids will be interrogated further, and the Council reserves the right to reject these bids.

4.90 Tender Evaluation

4.91 The ITT pack will include an overview of the evaluation methodology, to provide transparency on how the tender responses will be assessed. A moderation session will take place to enable the Council to decide the consensus score following the assessment of the quality method statement responses and agree on the final feedback based on the most economically advantageous bidder given to the unsuccessful bidders.

4.92 A minimum quality score threshold will be applied, whereby if a bidder's method statement response is allocated with a score less than 2, then its entire tender submission will be rejected.

4.93 The tender evaluation team will consist of a minimum three members from the following teams

- Waste Team
- Technical waste consultants
- ICT Team

4.94 The Officers will score individually and then consensus scoring will be sought through moderation meetings moderated by the Procurement Team.

4.95 Contract Terms and Condition

4.96 The intention (subject to legal advice) is to base the contract on the Councils standard term adapted as appropriate to the service.

4.97 Savings and Efficiencies

4.98 Whilst overall costs are expected to increase potential savings will be achieved through utilising dialogue to agree the most cost-effective risk sharing positions with the contractors to minimise risk premium.

4.99 Contract Management

4.100 Contract Management will be carried out by the existing waste team. Regular monthly performance meetings will be held with the winning contractor. In addition inspection regime will be carried out to ensure compliance with the contract.

4.101 The Contract will include a suitable suite of KPIs to drive and incentivise required behaviour changes to improve service delivery.

4.102 Premier Supplier Programme (PSP):

4.103 The ITT pack will include the opportunity for the potential Bidders to sign up for the Council's Premier Supplier Programme, to enable them to receive prompt invoice payment. This will be included as part of the price evaluation.

4.104 London Living Wage

4.105 The London Living wage will be a requirement for this contract and part of the terms and conditions.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 The report to Cabinet in November 2022, clearly set out the possibility to extend the current contract with Veolia and agreed not to extend the current contract. This allows Croydon now to develop its own contractual arrangement from April 2025.

5.2 All four boroughs reached the same conclusion but recognised that there were synergies to be achieved by bulking the various recycle streams and tendering them in the market rather than embedding them and the risk of market fluctuations in the collections contract. This has been adopted for the services going forward and SLWP are progressing these in parallel.

5.3 Consideration was given to tendering the waste and street cleansing elements separately but given the interfaces and public concerns around spillage during collection, having one accountable contractor has been chosen and also ensures that the depot space will be utilised more effectively.

6 CONSULTATION

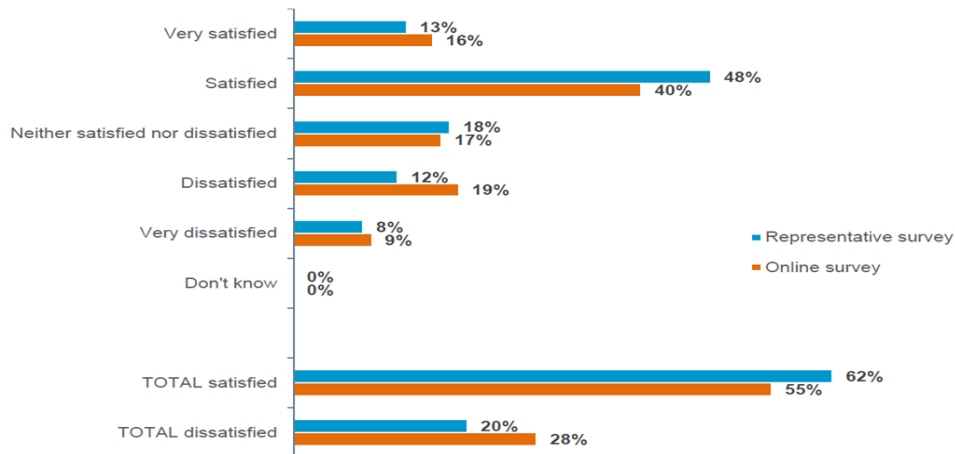
6.1 There are multiple external and internal stakeholders.

6.2 The Mayor of London - has significant rights and powers conferred by s353-361 of the Greater London Authority Act. The Council has a duty to give the Mayor of London's

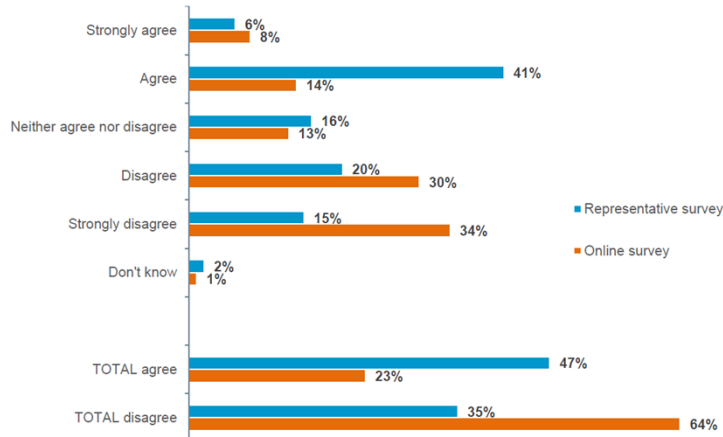
two years' notice of the expiry of any waste management contract (this has been done). The Mayor of London has a right to be consulted on any arrangements proposed to re-procure or otherwise replace a contract, with a view to ensuring that the arrangements made would remain in general conformity with the Mayor of London's Environment Strategy.

- 6.3 Should a decision be made to re-procure the services, the local authority must give the Mayor of London at least 56 days' notice of any intention to place a Prior Information Notice on its buyer profile, or 108 days of any intention to place a Contract Notice
- 6.4 The GLA have been sent a draft of the proposed specification for waste and recycling and there is an ongoing dialogue to enable the Specification to be tested in the market and meet the GLA's requirements to comply with the London Environment Strategy.
- 6.5 The Mayor of London could issue a direction to the local authority in the event that a contract was perceived not to be in general conformity with London Environment Strategy.
- 6.6 **Member consultations** – Two All Members Focus Group have been undertaken which have been designed to enable elected members to share their views and experience to help shape the design of the future service. The two sessions covered each of the main services with the first session focused on waste collection followed by the second session on street cleansing.
- 6.7 **Tenants and Lease Holders Panel**
- 6.8 In April 2023 officers from the services presented an update on the current performance of the waste collection and street cleansing service along with a high-level overview of the findings from the recent resident survey which illustrated that the level of satisfaction of residents with communal collections are more likely to be dissatisfied with the service when compared to those with an individual waste container.
- 6.9 It is important to note that all though communal collections only make up 3% of the collection service it impacts nearly 20% of our residents, as such any new contract provision will need to differentiate between the different property types and be tailored to meet the needs of our residents.
- 6.10 **Residents' engagement** – The council through the SLWP commissioned Enventure Research to hear from residents what works well in the waste and street cleansing services that they currently receive, what needs to be improved and what elements of the service they value and would want to see maintained.
- 6.11 In total 2,654 responses to the survey were received comprising of 406 representative responses from telephone interviews and face to face focus groups along with 2,248 on-line survey responses. The two separate focus group discussions were targeted at specific property types. Group one was representative from house holds with kerbside collections and group 2 was made up of representative from flatted properties
- 6.12 In reviewing the findings for waste collection (see Graph 1 below) up to 62% of residents responded positively in regards to their overall satisfaction with the waste collection service. Those who indicated that they were dissatisfied with the recycling

and waste collection service were then asked why this was. The most common response across both surveys was missed collections and bins not returned back to the original collection point.



6.13 The resident feedback on the street cleansing service highlights that this is an area of importance to our residents and particularly the frequency of cleansing in residential roads with c235-45% of residents were satisfied with the current frequency of the service.



6.14 In order address these concerns without increasing cost we will need to find improvements in the operational service and target our available resources smarter utilising data to drive the operational deployment of the service. In addition a review of our contract monitoring and Council lead inspections will need to be established.

6.15 It is important to note that the needs of our residents in our housing estates and flats are different to those in houses as such the service will continue to work closely with Housing Services in designing a service which meets these needs. To achieve this representatives from this service area will form part of the project team and will attend relevant dialogue meetings with the bidders prior to the final submission of tenders.

6.16 A summary of the survey results can be seen in Appendix 2 Croydon Resident Insight Research Report.

6.17 The findings from the survey will help officer in drafting the service specification.

- 6.18 SLWP Triennial Survey Nov 2022-** In addition to this the SLWP has completed its Triennial resident survey. The SLWP triennial survey is a reflective, closed, invite-only consultation limited to just over 1,000 residents across the SLWP region. The survey is conducted by an independent social research company and has taken place every three years since 2010. This is a regular survey undertaken by the SLWP and the results from this survey will be used to support the delivery of the SLWP work programme and inform the development of the Joint Waste Strategy and the next Communications Strategy for 2023-2026.
- 6.19** The results from these survey's will be used to inform and support the work looking at the future of the waste services specification.
- 6.20 Soft Market Testing**
- 6.21** Soft market testing exercise with key suppliers has been completed, helping to shape the direction of future services and assist in designing our service specification. The soft market testing will also help ensure that the risk positions in the tender is acceptable to the market ensuring sufficient competition.
- 6.22** Engagement with the market has confirmed that there is a strong level of interest in tendering for a combined waste collection and street cleansing service in Croydon.
- 6.23** In regards to the Environment and carbon reduction the market is actively looking at Carbon neutral solution, however it is clear from the feedback that a fully electric fleet including the specialist Heavy Goods Vehicle (HGV) is considerable more expensive and comes with associated risk given that this is new technology not fully tested for the whole life cycle of the HGV .
- 6.24** In reviewing the feedback from the market, it is clear that the current appetite for risk sharing is no longer attractive and as such all suppliers have suggested that given the uncertainty of the changing legislation the contract will need to provide flexibility and accommodate operational changes. As such the market is keen to differentiate between waste collection from the disposal of waste.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** As a key Mayoral pledge, we are committed to tackling the 'broken window effect' to improve the quality and appearance of the street space environment, to encourage investment and tackle low-level anti-social behaviour.
- 7.2** These services are directly linked to Mayors Business Plan 2022-2026 Make our streets and open spaces cleaner so that Croydon is a place residents and businesses can feel proud to call home.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** Current services are operating within the current budget provision but are under pressure. Although efficiencies will be sought and explored through the tendering exercise any future service is likely to require budget growth to meet the current service level requirements.
- 8.1.2** The final financial impact beyond 2025 will vary according to the new service specification supporting the delivery model along with the final tender price submitted.
- 8.1.3** Waste Consulting LLP, a specialist waste management and financial resourcing advisor were commissioned through SLWP to undertake financial analysis of the options available for the future commissioning of our waste and recycling services and street cleansing function. (See Confidential Appendix A for a financial assessment of each delivery model)
- 8.1.4** Waste Consulting LLP have provided anticipated gross financial cost estimates for each of the three (3) main delivery options based on the current 'As Is' service for , Contracted Out (third party contractor) , Direct Service Organisation (In House) and Local Authority Trading company (LATC)
- 8.1.5** Based on current modelling all the options under consideration will require a growth bid as part of the 2024/25 budget setting process.
- 8.1.6** A soft market testing exercise with key suppliers has been undertaken helping shape the service design for the future service and contract specification.
- 8.1.7** It is clear that the market will not support the current guaranteed Income from chargeable services such as Garden waste subscription and the sale of recyclate material as such these cost will incurred directly by the Council post any contract award in 2025
- 8.1.8** It is clear from our soft market testing that the market appetite to risk has significantly changed and as such the Council can not expect to mitigate any new budget pressure through any contractual mechanism linked to guaranteed incomes from the sale of recyclable material, chargeable services including both Commercial and domestic services.
- 8.1.9** In addition to the required increase in revenue cost the Council will need to make provision within the Capital programme for the required improvements to the waste transfer station and depot infrastructure

8.1.10 Revenue and Capital consequences of report recommendation

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2022/23 £'000	2023/24 £'000	2024/25 £'000	2025/26
Revenue Budget Available				
Expenditure	0	500	500	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	0	500	500	0
Income	0	0	0	0
Remaining Budget	0	0	0	0
Capital Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	0	0	0	0

8.1.11 There is no direct cost to council in terms of contractual value on the recommendation of this report as this recommendation is approve the procurement strategy set out in this report via a Competitive Dialogue process.

8.1.12 There will be a cost for the procurement process if the recommendation within this report is agreed, which is expected to be £1m over the two years of 2023/24 and 2024/25. This is being funded through a growth bid agreed in the 2023/24 MTFS Budget Setting process as per table above.

8.1.13 As per the note in the recommendations (2.15) it is anticipated that there will be a revised cost in terms of contract value on the procurement of a new Waste Collection

contract which will be both revenue and capital expenditure. Although there is no known cost at this stage it should be noted this will need to be built into budgets from 2025/26 and so should be part of the 2025/26 MTFS Budget Process. This will include a position on capital purchases be that through the contractor or by the council through prudential borrowing.

8.1.14 Comments approved by Darrell Jones Acting Head of Finance Sustainable Communities, Regeneration & Economic Recovery Directorate on behalf of the Director of Finance 24th April 2023.

8.2 LEGAL IMPLICATIONS

8.2.1 Pursuant to clause 1(1) of the Localism Act 2011 a local authority has power to do anything that individuals generally may do. The Council also has power under section 1 of the Local Government (Contracts) Act 1997 to enter into a contract with another person for the provision or making available of assets or services, or both, (whether or not together with goods) for the purposes of, or in connection with, the discharge of a statutory function by the local authority.

8.2.2 Local authorities have legal duties with regards the collection of waste, the disposal of waste and to keep Highways and public lands clear of litter under the Environmental Protection Act 1990. The contract with Veolia currently satisfies those statutory duties.

8.2.3 In accordance with section 358(1A) of the Greater London Authority Act 1999 the Mayor of London needs to be notified no less than 56 days prior to issuing a PIN. Where no PIN is issued 108 days' notice needs to be given to the GLA prior to a contract notice being issued.

8.2.4 In determining options, the Council must ensure that it meets relevant statutory and other applicable obligations as detailed. These obligations include the collection of waste and its disposal under the Environmental Protection Act 1990, meeting carbon reduction targets and commitments made in relation to the Environment Act 2021 and obligations required by the Greater London Authority. Further detail is provided in the report.

8.2.5 Where the Council intends to re-procure the services or any part of the services, it must ensure that it advertises the contract/s in accordance with the Public Contracts Regulations 2015. The recommendations for a procurement using a competitive dialogue approach is permitted by regulation 30 of the Public Contract Regulation 2015.

8.2.6 When considering available options, consideration must be given to TUPE and pensions and any resultant cost implications in the event that TUPE applies and any

subsidiary arrangement that must be replaced or terminated contemporaneously with the Veolia contract.

8.2.7 The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000 and to delegate those functions. At present the delegations in the Council's Tenders and Contracts Regulations have been superseded by the Executive Mayor's Scheme of Delegation following the introduction of the Mayoral Model and the specific delegations in the annual procurement plan approved by the Executive Mayor in Cabinet on 16th November 2022 and 23rd March 2023.

8.2.8 The Executive Mayor has not delegated authority to make the decision in question and retains the authority to make the decision.

8.2.9 Approved by the Head of Commercial and Property Law on behalf of the Director of Legal Services and Monitoring Officer

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

1. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3.2 There are no material equalities implications resulting from the recommendation(s) of this report. Equality implications will be addressed in the delivery of future services and further consultation will be undertaken as future services are designed and a commissioning strategy drafted.

8.3.3 Specific works and services will be developed through any commissioning process.

8.3.4 The council will build on existing best practice and take account of lessons learnt with internal and external stakeholders, including through resident survey work planned when developing any service specification utilising the Added Social Value Toolkit.

8.3.5 As this is an options review, a full equalities impact assessment will be undertaken and approved prior to any new service provision.

8.3.6 Current waste collection and street cleansing policies and procedures have been designed to ensure that all our residents have full access to the services. There are no planned material changes or implications that are as a direct result from any of the recommendations contained within this report, as such no new equalities Impact assessment have been undertaken.

8.3.7 The Contract Management Framework is required to work within the framework of the Equality Strategy 2020- 2024. The deliverables in the Equalities Strategy should be incorporated into the Contract Management Framework and policy documents as detailed below:

“Outline how the proposed contract(s) will comply with the Public Sector Equality Duty outlined in Section 4 of the EQIA; and meet the outcomes of the Council’s equality strategy, particularly:

- i. All Council contracts contribute towards delivering our equality objectives
- ii. Council contractors are inclusive and supportive of vulnerable groups
- iii. Ensure that every strategy, delivery plan, council contract and staff appraisal has an equality objective linked to it.
- iv. That contractors be requested to adopt Croydon’s Equality and George Floyd Race Matters Pledges”.

8.3.8 Following the potential award of contract, new assessment will be undertaken based on the new service delivery model and supporting specification which may have a direct impact on our residents. These will be aimed at those who have protected characteristics specific for disabled and elderly residents.

8.3.9 Comments approved by Denise McCausland Equality Programme Manager 27/04/23

8.4 Procurement Implications - Competitive Dialogue

8.4.1 The competitive dialogue approach takes the proposed new service specification and seeks the bidders to share their views on how this can be improved. For example this approach allows us to seek innovation and new ways of addressing current challenges in services deliver such as the operational approach to Houses of Multiple Occupancy (HMO) and house estates of differing sizes and design.

8.4.2 In addition it allows tenders to be submitted as an ‘initial solution’ It provides the ability to negotiate with bidders during each round of dialogue both on price and the quality of their proposed solution. As such the process encourages the ongoing refinement of the service design and provides bidders with the opportunity to highlight their innovation and areas that they believe they can improve upon prior to a ‘Final tender’ being submitted in line with the final agreed service specification.

8.4.3 Approved by: Matthew Devan on behalf of the Director of Commercial Investment 09/05/2023 - Approved by Strategic Procurement Manager

8.5 HR Implications - TUPE

8.5.1 TUPE implications will need to be considered with any new service delivery model and any subsequent re-procurement, both in regards to any roles which may potentially transfer under TUPE directly from our current contractor into the Council or over to a new replacement service provider.

8.5.2 If the service was to be brought back under the direct management of the Council we would need to consider the additional HR resource requirements directly supporting the front line operational staff.

8.6 RISK Implications

8.6.1 Whilst there are many procurement challenges, timely decision making and good consultation means that the procurement strategy and use of Competitive Dialogue enables the Council to consider all of these challenges and shape the design of the service moving forward.

8.6.2 The table below summarises the main strategic risk identified for the procurement of these services.

RISK	MITIGATION	RATING
All 4 neighbouring borough are currently considering approaching the market for a new waste and street cleansing service in 2023. This may cause the market to be selective or result in resource pressure within their respective bid teams	Risk is reduced through a coordinated and staggered commissioning timetable with our neighbouring boroughs through SLWP along with a standardise core set of documents (SQ, ITT, PA) to minimise this pressure on potential bidders.	AMBER
The private sector is changing and focusing on quality contracts along with reducing their appetite for risk. This significantly reduces the size of the market and level of competition.	Specification will use SMT feedback and market knowledge to ensure that risk is apportioned appropriately. Ensure that the specification and risk profile is in line with the findings from the soft market testing and that the Councils service specification maximises our controllable assets such as the depot at Factory Lane and transfer station.	AMBER
The cost of delivering these services on a like for like basis will increase for the reasons set out in the report.	The Council will continue to review service designs, technology, Commercial Dialogue will enable the Council to highlight the markets proposed financial cost early in the process and gives the flexibility to amend the specification and service requirements within an agreed financial envelope.	RED
Service quality may be affected by mobilisation of new provider	Mobilisation and contingency plans will be assessed during any procurements to ensure robust arrangements. The	AMBER

	current proposed time line build in a 1 year mobilisation period	
Risk of Procurement Challenge resulting in being unable to award new contract. Very High-Cost Impact	Check and challenge at each stage of process from Croydon procurement, legal and finance. Running a standstill period.	AMBER
Potential delay in the service if the timetable does slip	Every effort will be applied to consider potential unforeseen delays within the procurement process, which could impact the required contract start date of March 2023. A procurement activities timetable has been developed, including contingency allowed for potential unforeseen activities that may occur. Ensure project management applied to monitor and escalate any delays. As the Council owns the vehicles a reduced mobilisation period would be manageable.	AMBER
Resource requirement for Competitive Dialogue Process.	Ensure project management applied to identify resources, pressure points and any gaps. Consider bringing in additional temporary resource if required	AMBER

9. APPENDICES

Appendix 1 Service Delivery Options

Appendix 2 Croydon resident Insight Survey

Part B - Confidential Appendix A – Financial assessment

10. BACKGROUND DOCUMENTS

10.1 Previous Cabinet report of 16 November 2022

11. URGENCY

11.1 N/A