

# DEPARTMENT OF INFRASTRUCTURE

## Public Consultation

### Waste Strategy Principles



**Isle of Man**  
**Government**

*Reiltys Ellan Vannin*

## Overview

The Department of Infrastructure (DOI) is consulting on the principles to be used to determine an updated Isle of Man Waste Strategy for the intended period 2025 - 2035.

This consultation is seeking stakeholders' views on the proposed principles, which will then be used to develop a more detailed strategy. The aim is to develop a Waste Strategy that is reliable, economical, environmentally acceptable and sustainable for the benefit of everyone on our Island.

## Why your views matter

This consultation will provide us with a useful opportunity to consider stakeholder views at this stage of our policy development before introducing any contractual and/or legislative changes to bring the proposed changes into effect.

## How to participate

The Department would like to hear your views on the principles for the new Isle of Man Waste Strategy. To participate in this consultation by post or e-mail please submit your responses using this form to:

Waste Management Unit  
2<sup>nd</sup> Floor, Markwell House  
Douglas,  
Isle of Man  
IM1 2RZ

[rita.greenwood2@gov.im](mailto:rita.greenwood2@gov.im)

## About you

### What is your name? (optional)

Name:

### What is your age group? (optional)

	Under 16 years
	16 – 24 years
	25 – 34 years
	35 – 44 years
	45 – 54 years
	55 – 64 years
	65 – 74 years
	75 years or over
	<a href="#">Prefer not to say</a>

### Are you a Waste Operator? (optional)

	<a href="#">Yes</a>
	No

### What is your Local Authority Area? (optional)

Local Authority: [Douglas City Council](#)

### Are you responding on behalf of an organisation? (optional)

	<a href="#">Yes</a>
	No

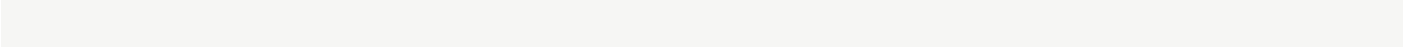
Organisation:

### May we publish your responses?

	<a href="#">Yes, you can publish my response in full</a>
	Yes, you may publish my response anonymously
	No, please do not publish my response

Please read our [Privacy Policy](#) for more details and your rights.

## **More information**

- Publish in full – your first name and surname, organisation name, along with full answers **will** be published on the hub (your email will **not** be published)
  - Publish anonymously – only your responses **will** be published on the hub (your name, organisation and email will **not** be published)
  - Do not publish – **nothing will** be published publically on the hub (your response will only be part of a larger summary response document)
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# Introduction

## Current Situation

The current management of household waste and services provided by Local Authorities vary as to whether collections are every 1 or 2 weeks, kerbside collection of recyclables and more recently whether, a Civic Amenity Site service is provided.

Which types of wastes are recycled on the Island is largely dependent on whether it is more economical for the Local Authority, waste management company or waste producer to send these materials to the UK for recycling or pay the gate fee at the Energy from Waste (EfW) facility or landfill for disposal. This does not take into account the economics of operating the Island's national waste infrastructures or meeting the objectives of the Island's Waste Strategy.

Central Government waste facilities generate income from gate fees while Local Authorities generate income for household waste facilities through rates and any commercial waste facilities through charges. Currently Government subsidises the Energy from Waste facility by approximately £2.5m per annum and the Animal Waste Processing Plant (AWPP) by £500k per annum.

## Proposed Strategy

The Isle of Man's Waste Strategy will consider all waste streams including households, business, agriculture and industry. This is a significant opportunity to maximise the use of the existing waste infrastructure, review options to obtain the best value from recyclables, to reduce greenhouse gas emissions and encourage new business to grow our green economy.

Consideration of a centralised hub for waste recycling and potentially centralisation of household waste collections is proposed to reduce costs, standardise household waste services and increase recycling through economies of scale. Utilisation of waste facilities such as the Energy from Waste facility should be reviewed to ensure they continue to provide public value.

## Policy Proposals and consultation questions

The EU Waste Framework Directive (Directive 2008/98/EC) established the waste hierarchy as the guiding framework for managing waste. The focus was to be on waste reduction, with reuse, recycling, and recovery of energy all of greater priority than final disposal. The waste hierarchy usage in the Waste Strategy should be designed to fit the Island's waste policies while encouraging prevention, reuse, recycling, and recovery of waste taking into account the Island's distinguishing characteristics, and physical location, which impact on how wastes can be managed.

## Island Plan Objectives

Our Island Plan can be found at <https://islandplan.im/> .

Waste is part of the economy and its management has economic implications for businesses, government expenditure and impacts the environment. A Waste Strategy is required to align with the objectives of the Island Plan.

**Do you agree that a Waste Strategy should be determined to move towards a strong and diverse economy and an environment we can be proud of in accordance with Our Island Plan?**

	Strongly disagree
	Disagree
	Neither agree or disagree
	Agree
	<b>Strongly agree</b>
	I don't know
	Prefer not to say

**A revised Waste Strategy is long overdue, and any resulting strategy needs to be supported by strong legislation more in line with the UK's Environment Protection Act 1990 and the Environment Act 2021. Both the Isle of Man's Public Health Act 1990 and the Collection of Disposal of Waste Regulations 2000 are in desperate need of updating and overhaul. It is the ineffectiveness of this legislation that has led to multiple and diverse delivery of services on the Island. The Island is decades behind most western countries and indeed many developing countries in terms of its attitudes towards and treatment of waste.**

**Any resulting Waste Strategy should be based on independent, expert and scientific analysis of the Island's waste arisings and quantities, its geographical location and access to disposal routes. The carbon impact of not recycling certain materials should also be calculated including the carbon 'cost' of producing these from virgin materials, transportation and manufacturing (whole lifecycle of material).**

**Agree that the Waste Strategy should support a strong and diverse economy however this should not be at the expense of effective delivery of high-quality public services, delivered at the local level.**

## Collection of household waste

Currently household waste collection and any kerbside collection of recyclables is controlled by and the responsibility of the Locals Authorities. As each Local Authority is responsible for their own area the service provided differs depending on where you live e.g. inclusion of kerbside recycling collection and collection of general household waste every 1 or 2 weeks. There are numerous contracts in place with differing costs and associated differing rate costs for the management of household waste. Optimising collection routes and standardising refuse collection vehicles through a centralised service will also assist in reducing emissions to achieve the Isle of Man Climate Change Plan 2022-2027 objective.

Potential cost savings and emissions reductions could be realised by:

- Centralising the collection and management of household waste
- Optimising collection routes and vehicles
- Powering bin lorries with zero or low emission fuel sources.
- Bulking up recyclables to obtain best market values and economise export costs.
- Optimising energy recovery by disposal of incinerable wastes to the EfW facility.

**Do you agree that the Waste Strategy should determine how centralising household waste collection services could reduce costs, reduce environmental impact including greenhouse gas emissions and determine appropriate household waste provisions for the Island?**

	<b>Strongly disagree</b>
	Disagree
	Neither agree or disagree
	Agree
	Strongly agree
	I don't know
	Prefer not to say

**Given the size of the Isle of Man in terms of population, it makes perfect theoretical sense for there to be a more centralised collection and treatment of domestic and commercial waste or at very least, route/vehicle/staff optimisation on a more regional basis. However, in determining whether this should be the case, the following needs to be borne in mind:**

- **The primary and secondary legislation on the Isle of Man does not currently support centralised collection, treatment or disposal of waste.**
- **Local Authorities and local politicians will lose control and influence over what is seen by many as a very important and locally delivered and high-quality public service. The responsiveness of a centrally provided service is questionable.**
- **This will further erode the role of local government.**
- **The Isle of Man Government has very limited experience in running waste collection operations and centrally delivered Government services face many challenges, both currently and in the past. Any centralised waste collection, treatment and disposal system needs to be operated by an arm's length organisation with experience and competence within the waste arena, which could be an existing provider on Island with an established and scalable model already in place.**
- **There will be significant set up costs for Government in terms of equipment, vehicles, plant and staffing – will this be at taxpayers' expense? What is the intended funding mechanism? The consultation document is completely silent on this point. If it is intended that a precept will be applied to all Local Authorities to fund this initiative, there is a real risk that the precept will be**

**greater than the current cost of providing the service locally, negating any imagined savings of this proposal.**

- There will be a significant rate impact for Local Authorities, some of whom may cease to exist should the waste function be removed. Would Local Authority re-organisation be a better way to go which would make reformed local authorities more efficient and accountable to their rate-paying residents.**
- There will be potential significant 'standing-down' costs for Local Authorities in terms of redundancy, off-lease and contract termination costs which will be met by rate payers, who may also be hit by a waste precept and the costs of setting up a centralised service.**
- There is no Transfer of Undertakings (Protection of Employment) (TUPE) legislation on the Isle of Man so significant waste collection expertise already contained within Local Authorities will be lost.**
- Any strategy to fundamentally change the way waste is collected and processed by the Island should be informed by independent experts such as the Waste & Resources Action Programme (WRAP) or Zero Waste Scotland. The Island's geographical location needs to be acknowledged in terms of devising possible solutions, however, the final strategy should be based on sound environmental reasons only and not on a desire to alleviate legacy problems in terms of over-capacity at the Energy from Waste facility.**
- Unless robustly legislated for, any hoped for cohesion for Island residents would not be achieved, the perceived economies of scale not realised, and an end result the same as is currently being experienced.**
- Agree that refuse collection vehicles should be powered by low emission fuel sources that are reliable and efficient, but that cannot be achieved until the Isle of Man Government determines which low carbon fuel source is to be used on the Island – while electrically powered refuse collection vehicles are available, they are extremely expensive with a low driving range.**
- Agree that centralised bulking up in a government owned facility to which all Local Authorities have access would bring economies of scale. That facility is available now for Government to purchase and run, and it would not need centralisation of waste collection to achieve this benefit.**
- Agree with optimising energy recovery provided it is the right thing to do from an environmental perspective which has been scientifically proven.**



## Prevention & Minimisation

By reducing or eliminating waste generation, this supports efforts to promote a more sustainable society. Waste minimisation involves redesigning waste processes and/or changing societal patterns of consumption and waste production.

In the UK waste reduction is encouraged through legislation requirements which include waste minimisation plans at Local Authority level and waste management plans at Central Government level, identifying key sectors for action e.g. construction, electronics, plastics, packaging, food.

The Waste Strategy should assess the key sectors and the legislation changes required to assist with encouraging waste reduction for the Island.

### **Do you agree the Waste Strategy should determine a Waste Reduction Programme to divert products and materials from residual waste and stimulate recycling opportunities for the Island?**

	Strongly disagree
	Disagree
	Neither agree or disagree
	Agree
	<b>Strongly agree</b>
	I don't know
	Prefer not to say

**The Island should use the opportunity presented by a review of its Waste Strategy to align more closely and catch –up with other jurisdictions in this regard and having a more sustainable approach to Waste Management will support the Island’s Climate Change goals and its Biosphere Status. In addition, there are many waste streams for which there are no current solutions on Island and these should be addressed in any new Waste Strategy, for example, damaged electrical vehicle batteries, Lithium batteries, Lithium-ion batteries and various gas cylinders.**

**Prevention and Minimisation benefits can be achieved through legislation without the need for centralised waste collection such as Deposit Return Scheme (e.g. 25p added to a plastic bottle purchase or tin and when returned receive 25p back and Producer Responsibility Scheme whereby the producer is responsible for ensuring returns in line with EU Regulations.**

**DEFA have recently announced changes to the small WEEE policy and the wider WEEE contract to be implemented in January 2025. Shouldn't waste disposal and processing be coordinated through just the one department of Government to allow for a more cohesive strategy? Currently, the DOI's own Waste Management Unit do not know the implications for the Civic Amenity sites with regards to the required skips or containers for this new policy for example. This means that it is impossible for all sites to budget accurately for next year, as it may mean that they have to invest in additional containers or skips and also additional staff to help ensure no small WEEE is being deposited in the metal skips. Every aspect of Waste Management direction on the island should be led by just one Department and do so with the understanding of budget timings and how a Civic Amenity site functions.**

## Reuse & Recycling

Creating less waste by increasing awareness of the need to reuse and recycle more types of materials that have value, while making it easier for the public and industry to do so, is recommended.

The current recycling facilities on the island include kerbside collections in Douglas and Braddan, Civic Amenity Sites and 'bring bank' bins located around the Island, as well as other private enterprises. The cost to operate Civic Amenity Sites varies from £120 - £186/tonne of waste depending on the site. The revenue generated from the recyclable material collected varies between the sites as each have different contracts.

Centralised management of recyclable material targeting the most valuable recyclables and the recycling of waste streams that have a negative impact on operations of the current waste infrastructure is recommended. This includes waste electrical and electronic equipment, batteries, glass, and metal being sent to the Energy from Waste facility.

The centralised management of recyclable material would assist with gaining more revenue as better prices potentially could be achieved for larger volumes, alongside reduced costs from optimising transport. Any contamination could be removed from the waste to improve the value of the recyclable material. Targeting high-value recyclables should result in recycling schemes paying for themselves.

The Waste Strategy should:

- Aim to increase re-use and recycling by including requirements for this in waste management legislation.
- Assess which recyclables have value, including optimising current waste facilities for disposal of waste streams that have low recycling value.
- Develop an Island wide collection and central recycling facility for target recyclables.

### Do you agree that the Waste Strategy should determine ways to increase reuse and recycling of the Island's wastes?

	Strongly disagree
	Disagree
	Neither agree or disagree
	Agree
	<b>Strongly agree</b>
	I don't know
	Prefer not to say

**Strongly agree that any new Waste Strategy should determine ways to increase reuse and recycling of the Island's waste but strongly disagree with the definition of the 'most valuable recyclables' given above which is based on (a) potential income that can be derived and (b) whether it is an acceptable material to be received at the EfW.**

**This is too narrow a definition and the DoI may be conflicted in that they are seeking to derive a new Waste Strategy and resolve an existing issue. The two should not be merged and this highlights the need for independent expert analysis to inform what is right for the island and what should be included within a Waste Strategy.**

**Given how notoriously volatile the recycle market is, it would be positively dangerous to make firm decisions on anticipated income. To illustrate this point, the market price per tonne for mixed plastic in August 2024 was between £20-£95 whereas in April 2024 it was £120-£200. If plastic was further separated into its different types, for example, HDPE natural, then the potential income in August 2024 would be £400-£500 per tonne. A similar argument can be made for other high calorific materials such as cardboard and paper.**

**What the Island recycles should, as is the industry standard and approach elsewhere, absolutely be driven by sound environmental reasons. Paper, cardboard and plastic have high calorific value for**

**the EfW but burning and not recycling cannot be preferred when considering the overall carbon costs of deriving these products from virgin materials and not recycling them. As is the case elsewhere, the Waste Strategy should be based on the internationally recognised waste hierarchy which suggests that if a viable disposal route and bulking up is available to optimise the material value, recycling should be pursued ahead of energy recovery.**

**Reducing consumption of non-renewable resources, specifically rare earth materials and fossil fuels was identified within the May 2022, Report on Waste Strategy at paragraph 2.3 (and footnote 1) and paragraph 2.4. It is disappointing therefore to see suggestions of sending recyclate containing rare earth materials, such as Lithium, the oils contained within plastic and fossil fuels for energy recovery.**

**Suggesting that only targeting high value recyclates to have recycling schemes pay for themselves demonstrates Government's lack of experience in this arena. Collecting waste and recyclates will likely always be a subsidised public service if it is being undertaken for the right environmental reasons.**

**The Reuse and Recycling benefits cited within this section can be achieved through legislation without the need for a centralised waste collection service.**

**Access to Climate Change Funds would assist Local Authorities in meeting the island's Net Zero targets.**

## Energy Recovery

The current Energy from Waste facility can reasonably continue to operate until at least 2035 without the major capital expenditure of building a new facility. The tonnage incinerated at the Energy from Waste facility has significantly reduced over the years to just under 50,000 tonnes in 2023. This has had an impact on the operations of the facility requiring it to shutdown 4 to 5 times a year, which is more than the projected maintenance shutdown of twice a year. Each shutdown requires 30,000 litres of oil for the subsequent restarting of the facility, with associated costs, emissions and environmental impact.

The benefits of maximising electricity generation through the Energy from Waste facility, potentially up to 10% of the Island's needs, by diverting low value recyclable wastes with high calorific value to the facility should be determined. This would also reduce the need to generate electricity from fossil fuels.

The Waste Strategy should:

- Assess prolonging the lifespan of the current Energy from Waste facility.
- Optimise the operation of the Energy from Waste facility by energy recovery from burnable waste streams of low recyclable value.
- Assess the recovery heat from the Energy from Waste facility.

**Do you agree that the Waste Strategy should maximise energy recovery by diverting incinerable wastes to the Energy from Waste facility?**

	<b>Strongly disagree</b>
	Disagree
	Neither agree or disagree
	Agree
	Strongly agree
	I don't know
	Prefer not to say

**Decisions about what should and should not be recycled by the Island need to be made on sound environmental grounds and not to try and mitigate for legacy issues. The island would be guilty of greenwashing in terms of its biosphere status and net zero aspirations if it were to burn highly valuable recyclates such as paper, cardboard and plastics because it is trying to resolve a legacy issue with the EfW. It would almost certainly also be against several United Nations sustainable development principles.**

**Experience within Douglas and in other jurisdictions is that introducing an island wide recycling scheme WILL lead to decreases in general residual waste. As householders understand what they are disposing, they will alter their behaviours to reduce their own waste, which will inevitably have a knock-on effect at the EfW. The statements within this section further highlight Government's lack of experience in this arena, and the need for off Island experts to undertake a full analysis and provide a series of recommendations that need to be based on sound environmental considerations ONLY.**

**Government will need to seriously bolster its Waste Management if it is to consider centralising waste collection and processing. The current arrangement has been ineffective for several years and has seldom 'led' on waste matters with initiatives in the waste arena having been led by Local Authorities and some private enterprises (working closely with Local Authorities). The way Waste Management operates will need to fundamentally change going forward if it is to be responsible for a centralised waste collection, processing and disposal system.**

**If the end goal is to have all residents operating within the same waste collection system, that can be achieved through legislation without the cost of setting up a centralised service.**

**The Waste Strategy should be based on the internationally recognised waste hierarchy which suggests that if a viable disposal route and bulking up is available to optimise the material value, recycling should be pursued ahead of energy recovery.**

## Incineration of Hazardous Wastes

Under current legislation the secondary waste incinerator can only dispose of clinical waste and waste oil. The replacement secondary waste incinerator for 2025 has the design capability to incinerate additional hazardous waste streams such as flammable waste, pesticides and some small laboratory waste. The current cost to industry for shipment and disposal in the UK for flammable waste is £3,000-£4,000/tonne, and for pesticides £15,000/tonne. A change in legislation is required to allow additional hazardous waste streams to be incinerated in the secondary waste incinerator. This would assist with the Island's international responsibility to dispose of its own wastes and provide a more economic disposal route for some of industry's hazardous wastes which are currently exported off Island at great cost.

The Waste Strategy should:

- Aim to change legislation to allow the disposal of additional hazardous waste
- Optimise the operation of the secondary incinerator by burning additional hazardous waste to reduce disposal costs to industry.

**Do you agree that the Waste Strategy should explore maximising the utilisation of the secondary waste incinerator for self-sufficiency and economic benefit of disposal of the Island's suitable hazardous wastes?**

	Strongly disagree
	Disagree
	Neither agree or disagree
	<b>Agree</b>
	Strongly agree
	I don't know
	Prefer not to say

**It is currently a very costly exercise to dispose of hazardous wastes and there are transportation issues given the Island's geographical location, for example, some ferry companies have banned EV transportation. The Council is generally in favour of this proposal, but it would need to be supported by more scientific research into the associated risks.**

## Landfill

Landfill is the least desirable method of waste management, however it is acknowledged that the Island must have a secure landfill disposal site for some waste streams that takes full account of environmental and health impacts.

There are problematic waste streams on the Island that are too expensive to send to the UK for disposal. This is sometimes due to the large quantity of material such as marina dredging spoil or because a disposal route cannot be found in the UK for such small volumes, such as radioactive waste sources in schools and the hospital. The Island's current landfills are classified as 'dilute and disperse' landfill, with leachate from the landfill sites going out to sea. To continue with the 'dilute and disperse' approach will leave the Island with a potential legacy of pollution of ground water, rivers and coastal waters for future generations. Any new landfill should be developed to standards implemented in the UK as best practice with improved environmental protection.

To discourage unnecessary use of landfill sites the cost of disposing of waste streams to landfill should be more expensive than sending waste to the Energy from Waste facility or any recycling options.

The Waste Strategy should:

- Include a strategic needs assessment for new landfills for inert, non-hazardous, stable non-reactive hazardous waste, and hazardous waste
- Review the current lifespan of existing landfills and the environmental impact
- Assess legislation changes for environmental protection requirements for landfill operations
- Assess the introduction of financial disincentives to encourage recycling/recovery

**Do you agree that the Waste Strategy should determine the strategic need to develop new landfill(s), suitably engineered to provide appropriate environmental protection, for waste disposal where recovery (including re-use, recycling and energy recovery) is not reasonably practicable or economically viable?**

	Strongly disagree
	Disagree
	Neither agree or disagree
	Agree
	<b>Strongly agree</b>
	I don't know
	Prefer not to say

**The current landfill arrangements on the island are not fit for purpose and are at odds with the Island's biosphere status. Some of the materials being sent to landfill can and are re-processed in other jurisdictions, for example, plasterboard, reducing the need for landfill.**

## Legislative requirements

Whilst economic intervention such as the Energy from Waste facility gate fee or a landfill tax can influence waste recovery and/or disposal routes, to a certain extent, to achieve sustainability, protection of human health and the environment, and GHG emission reduction legislative changes are likely to be required to assist with implementing the Waste Strategy.

**Do you agree that the Waste Strategy should determine the legislative interventions likely to be required by the Government to assist implementation of the Waste Strategy.**

	Strongly disagree
	Disagree
	Neither agree or disagree
	Agree
	<b>Strongly agree</b>
	I don't know
	Prefer not to say

**Legislative changes are a must. The Government, like other jurisdictions, should legislate to make recycling a mandatory requirement based on a scientifically proven Waste Strategy on what is right for the Island given its size and geographical location, with worthwhile sanctions to change behaviours of both householders and organisations. Most of the cited benefits sought from this consultation can be achieved through effective legislation without the need for a centralised waste system.**



## Additional comments

Additional comment:

The Council is deeply disappointed that it was not consulted as a primary stakeholder ahead of public consultation. This is especially disappointing given the comments made in the May 2022 'Report on Waste Strategy' which stated on page 6, footnote 2 that "The Department will continue to work with Local Authorities to explore options for reducing the cost and environmental impacts of waste collection, and for decreasing the amount of potentially recyclable material in residual household waste. This will include considering the potential benefits from shared services, facilities, and schemes, and adopting common standards of operation. The Department will work with Local Authorities to determine how best such initiatives will be progressed'. The Council has repeatedly asked about progress of the new Waste Strategy and has repeatedly asked to be consulted early.

The questions being posed within this consultation paper are in the wrong order. The purpose of a Waste Strategy should be to set out the 'what' of how the Isle of Man deals with its waste. It should set out what the Island should recycle, based on independent and expert analysis and not opinion, to support the Island's Biosphere Status and Net Zero goals. Only once the 'what' has been established, can the 'how' be even considered – how waste should be collected, processed and disposed.

The consultation document is silent on how the centralised waste function will be funded. Will additional costs be passed to ratepayers? Will the EfW costs be passed to ratepayers? Local Authorities are the collection authorities and Government the disposal authority, and the two need to remain separate entities.

CA site provision was mentioned within the preamble but there are no specific questions on this matter. Who provides CA sites going forward will very much depend on the contents of a final Waste Strategy and while the issue in the north needs to be resolved, centralising all CA sites is out of proportion. Irrespective of whether this is a centralised function or still provided at the local level, legislation will be needed to ensure that CA sites are open to all residents regardless of their address and that, if provided locally, Local Authorities MUST contribute to their running. A Tynwald Resolution from June 2006 (given below) set out how the Government of that day thought CA sites should be run, but that was never followed through by means of an Act of Tynwald or legislation. That oversight should be rectified.

***11. All-Island Civic Amenity Site Provision -  
Motion made -***

***That Tynwald, notwithstanding the decision of this Honourable Court in January 2006 on item 13 of the Order Paper, endorses the principle that all Local Authorities contribute to a regional Civil Amenity Site and that all residents have equal access to any Civic Amenity Site on the Island.***

***Mr Rimington***

***Court divided.***

***Motion carried.***

**p5 – creation of a centralised hub for processing recyclate. This would be strongly supported by the Council, irrespective of whether waste continues to be collected locally. The Government needs to take a strong lead on encouraging the right behaviours, by providing facilities to enable local authorities and local businesses to process material collected and to ensure that shipping and onward sale is economically advantageous to the Island. Such a facility is already available, and Government could achieve this objective without the costly set up of a centralised collection service.**

**Absolutely no mention of looking to achieve a circular economy or closed loop system with waste. This should be a fundamental aspect of the Waste Strategy.**

**The consultation will close on the 31<sup>st</sup> October 2024.**