

# ONCHAN DISTRICT COMMISSIONERS

*Hawthorn Villa,  
79 Main Road, Onchan.*

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## ORDINARY MEETING

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*9<sup>th</sup> April 2026*

Sir/Madam

You are hereby summoned to attend an **ORDINARY Meeting of the Authority** to be held in the Boardroom at **HAWTHORN VILLA, 79 MAIN ROAD, ONCHAN** to transact the undernoted business on:

**Monday 13<sup>th</sup> April 2026**

**7:00 pm - Board Meeting**

which will be followed by a meeting of the Board sitting **IN COMMITTEE**. Items on this agenda marked **(P)** will be considered in private, and correspondence is circulated separately.

**Please note that the minutes referred to in the agenda have yet to be confirmed by the Authority as a true and correct record of proceedings at the various meetings, and will be published after ratification.**

Yours faithfully



**R PHILLIPS  
CHIEF EXECUTIVE/CLERK**

**AGENDA**

*The order of business at every meeting of the Authority shall be in accordance with that laid down in Standing Order No. 17 or by a resolution duly moved and seconded and passed on a motion which shall be moved and put without discussion.*

*Chief Executive/Clerk to provide emergency evacuation procedure for Hawthorn Villa at the commencement of the Meeting.*

**1. To choose a person to preside if the Chairman and Vice-Chairman be absent:**

None.

**2. Declarations of Interest of Members and Officers (in accordance with Standing Order 18):**

**3. To deal with any business required by statute to be done before any other business:**

None.

**4. To approve as a correct record and sign the Minutes of the:**

**4.1** Minutes of Ordinary Meeting held on Monday 30<sup>th</sup> March 2026 *(Appendix 4.1)*

**5. To dispose of any relevant business arising from such minutes if not referred to in the Minutes of any Special Committee:**

None.

**6. To dispose of any relevant business adjourned from a previous meeting:**

None.

**7. To deal with any business expressly required by statute to be done:**

None.

**8. To consider any planning decisions/communications from the Department of Infrastructure Planning Committee:**

**8.1 Plans for Consideration** *(Appendix 8.1)*

	Planning Reference	Applicant/Address	Return Date
(a)	PA 26/00037/B	Mr G Pye – The Hague, 8 Governors Road	24 <sup>th</sup> April 2026

**9. Finance and General Purposes:**

- 9.1 (P) Draft 2024/25 Year End Accounts *(Appendix 9.1)*
- 9.2 (P) Asset Valuation Consideration *(Appendix 9.2)*

**10. Consideration of any Reports from the Clerk or other Officer:**

- 10.1 Department of Infrastructure Waste Strategy 2025-2035 Consultation Feedback *(Appendix 10.1)*

**11. Consideration of any relevant correspondence (already circulated unless indicated):**

- 11.1 The Manx Family Community Centre *(Appendix 11.1)*
- 11.2 Department of Infrastructure – Local Government Amendment) Bill 2023 *(Appendix 11.2)*
- 11.3 Lawn Bowns (Flat Green)- Opening Day *(Appendix 11.3)*
- 11.4 Local Government Superannuation Scheme – Correspondence from the Chief Minister *(Appendix 11.4)*

**12. To answer any questions asked under Standing Order 25:**

**13. To answer any Motions in the order in which notice has been received:**

- 13.1 Motion 77 Members of the Public to ask questions of the Chair or relevant Commissioners *(Appendix 13.1)*
- 13.2 Motion 78 Board Members when relevant be named within the Minutes *(Appendix 13.2)*

**14. Environmental and Technical Services:**

None.

**15. Housing Matters:**

- 15.1 Amendment to Public Sector General Needs Housing Income Thresholds – Public Consultation *(Appendix 15.1)*
- 15.2 Social Housing – Draft Hoarding & Self Neglect Policy and Procedure 2026 *Appendix 15.2)*

**16. Chairman’s Announcements:**

**Dates for Diary:**

Date	Organisation	Event	Time
10 <sup>th</sup> April 2026	Onchan Silver Band	Spring Concert – Onchan Methodist Church	7:00 pm
13 <sup>th</sup> April 2026	Onchan District Commissioners	Board Meeting	7:00 pm
17 <sup>th</sup> April 2026	Trustees of the Crosh Pobble Chonnaghyn	Civic Reception – Hawthorn Villa	2:00 pm to 4:00 pm
17 <sup>th</sup> April 2026	Cullen Creative	Manx Crosses – Onchan Parish Hall	2:00 pm to 4:30 pm
27 <sup>th</sup> April 2026	Onchan District Commissioners	Board Meeting	7:00 pm
5 <sup>th</sup> May 2026	Onchan District Commissioners	Commissioners Surgery – Springfield Court	2:00 pmn to 3:00 pm

5 <sup>th</sup> May 2026	Onchan District Commissioners	Annual General Meeting	7:00 pm
9 <sup>th</sup> May 2026	Onchan District Commissioners	Commissioners Surgery – The HUB	10:00 am to 12 noon

17. **Any other URGENT business as authorised by the Chair for consideration**

**PLANS LIST****Board Meeting to be held on Monday 13<sup>th</sup> April 2026****The Lead Member of Environmental and Technical Services and the District Surveyor have viewed the applications and recommend the following:-**

	<b>Applicant/Address</b>	<b>Description</b>
<b>PA 26/00037/B</b> <b>Return Date</b> <b>24/04/2026</b>	Mr Gregory Pye The Hague 8 Governors Road Onchan IM3 1AU	Creation of new vehicular access onto Governors Road and formation of hardstanding in front curtilage
	<b>Recommendation – Approve</b>	



## REPORT

<b>Report to:</b>	Board of Onchan District Commissioners
<b>Reporting Officer:</b>	Chief Executive/Clerk
<b>Date of the Meeting:</b>	13 <sup>th</sup> April 2026
<b>Subject:</b>	Department of Infrastructure Waste Strategy 2025 to 2035 – Consultation Feedback
<b>Public or Private Document:</b>	Public

### **Introduction:**

The Authority has recently been contacted by the Department of Infrastructure in relation to the Isle of Man Government Waste Strategy 2025 to 2035. The Department intends to present the Strategy to Tynwald for consideration, but before doing so, it has requested that the Authority:

- 1) Consider the Waste Strategy 2025 to 2026, as well as the feedback received from the Waste Strategy Principles consultation undertaken in 2024; and
- 2) Provide feedback prior to the deadline of 30<sup>th</sup> April 2026.

### **Previously Considered by the Board:**

- Ordinary Board Meeting held on Monday 21<sup>st</sup> October 2024.  
Minute reference C24/10/02/13.
- Ordinary Board Meeting held on Monday 2<sup>nd</sup> February 2026.  
Minute reference C26/02/01/11.
- Concerns were previously raised by the Board in relation to the potential implications for the Authority's staff and ratepayers if the provision of refuse services is to be changed.

### **Recommendation/s or Action/s Taken:**

#### **Option 1**

That the Board agrees to provide feedback on behalf of the Authority to the Department of Infrastructure in relation to the Isle of Man Government Waste Strategy before the Department presents the Strategy to Tynwald.

**Supporting Rationale:****Reference to Local Authorities within the Strategy**

- The recurring wording in relation to local authorities within the Strategy relates to standards of performance, standardisation of service provision, and regulatory enforcement for non-compliance.

**Local Authority Refuse Service Delivery**

- It is recommended that support be given for the standardisation of service delivery throughout the Island, but only if it can be demonstrated that there is a tangible benefit. The benefit should be to benefit ratepayers, as they fund refuse services via the rating and valuation system.

It is highlighted that the Department will most likely encounter difficulties in obtaining agreement between all the local authorities in relation to service delivery standards. This matter has long been an unresolved issue in relation to other services already provided by local authorities, and something that the Department is yet to resolve.

- It is recommended that Departmental oversight and periodic reporting be supported, but only if the administration of this does not become overly burdensome and it provides a tangible benefit. The benefit should be to benefit ratepayers, as they fund refuse services via the rating and valuation system.

**Civic Amenity Site Service Delivery**

- The Eastern Civic Amenity Site Joint Committee has yet to meet to consider this matter. It is recommended that the Authority not comment upon civic amenity site service delivery until the Joint Committee has considered the matter.

**Re-establishment of the Waste Forum**

- It is recommended that the Authority support the re-establishment of this forum as it could provide many benefits for the Authority and ratepayers, especially in relation to:
  - Avoidance of recurring issues or problems.
  - Identification of emerging needs of service users.
  - Sharing of knowledge and resources.
  - Collaboration, especially between central and local government participants.
  - Transparency.

**Recycling and the Energy from Waste Facility**

- The Strategy appears to show a bias towards utilising the capabilities of the Energy from Waste Facility, rather than towards larger scale recycling of all recyclable materials.

This is a subjective matter and will most likely cause some division between stakeholders. It is recommended that the Authority support the increased use of

the Energy from Waste Facility, but only if more of a supporting rationale not solely relating to financial benefits can be provided by the Department.

### **Consultation with Stakeholders**

- It is recommended that the Authority highlight to the Department the importance of stakeholder engagement and consultation in relation to the progression of any primary and secondary legislation to support the Waste Strategy.
- Meaningful engagement with stakeholders such as the local authorities and ratepayers will ultimately provide outcomes which are transparent, accountable, and demonstrate fairness.

### **Alternatives Considered but not Recommended:**

#### **Option 2**

That the Board agrees not to provide feedback to the Department of Infrastructure in relation to the Isle of Man Government Waste Strategy before the Department presents the Strategy to Tynwald.

#### **Standing Orders:**

Not applicable.

#### **Resource Impact:**

Once regulatory changes are implemented via primary and secondary legislation as outlined within the Strategy, there will most likely be implications in relation to how the Authority has to deliver refuse services.

This will impact the staffing the Authority employs, as well as the machinery and infrastructure owned and hired to provide such services. Without further details available at this time, it is impossible to predict the level of impact.

#### **Financial Impact:**

Once regulatory changes are implemented via primary and secondary legislation as outlined within the Strategy, there will most likely be implications in relation to expenditure required to provide refuse services. This will also apply to the Eastern Civic Amenity Site, which the Authority is a member of as part of the Joint Committee, and supports financially.

Without further details available at this time, it is impossible to predict the level of impact. It is highlighted that the refuse services provided by the Authority are funded by the District Rate, and that, as the largest stakeholder, ratepayers should be consulted regarding any proposed changes.

#### **Legal and/or Insurance Impact:**

- Public Health Act 1990.
- Collection and Disposal of Waste Regulations 2000.

<ul style="list-style-type: none"> <li>• Import and Export of Waste Regulations 2000.</li> <li>• Climate Change Act 2021.</li> </ul>
<p><b>Equality Impact:</b></p> <p>Once the future provision of refuse services has been resolved, the Authority will need to assess its services in relation to equality to ensure that all individuals using a service are treated fairly and have access to the same resources.</p>
<p><b>Climate Change Impact:</b></p> <p>The Waste Strategy explicitly states that it aims to reduce carbon emissions and promote a circular economy, aligning itself with the Island's climate goals.</p>
<p><b>Consultation with Others:</b></p> <p>Onchan District Commissioners – Lead Member for Environmental and Technical Services, and District Surveyor.</p>
<p><b>General Data Protection Regulations and/or Confidentiality Impact:</b></p> <p>Not Applicable.</p>
<p><b>Appendices:</b></p> <p>See enclosed:</p> <ul style="list-style-type: none"> <li>• Correspondence received from the Department of Infrastructure regarding the Department's intention to present the Waste Strategy 2025 to 2035 to Tynwald, and a request for feedback from Onchan District Commissioners.</li> <li>• Isle of Man Government Waste Strategy 2025 to 2035.</li> <li>• Department of Infrastructure Principles for the Waste Strategy Consultation Feedback.</li> <li>• Department of Infrastructure Public Consultation regarding Waste Strategy Principles – including Onchan District Commissioners' responses as approved at the Ordinary Board Meeting held on Monday 21<sup>st</sup> October 2024.</li> </ul>

**For Members Consideration**



**ROSS PHILLIPS  
CHIEF EXECUTIVE/CLERK**

**Ross Phillips**

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**From:** Ross Phillips  
**Sent:** 25 March 2026 14:05  
**To:** Ross Phillips  
**Subject:** FW: Waste Strategy 2025-2035  
**Attachments:** Consultation Waste Strategy 2025 - 2035.pdf; Feedback\_Public Consultation\_Waste Strategy Principles.pdf

**From:** [REDACTED]  
**Sent:** 24 March 2026 16:05  
**Cc:** DOI, Minister <[Minister.DOI@gov.im](mailto:Minister.DOI@gov.im)>  
**Subject:** Waste Strategy 2025-2035

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Local Authorities,

The Department is preparing to present a Waste Strategy 2025–2035 to Tynwald and is seeking feedback from Local Authorities prior to its submission. Your views are important to ensuring that the strategy is practical, deliverable, and reflective of community needs across the Island.

You will recall that in 2024 the Department conducted a public consultation on the principles intended to underpin this long-term strategy. The attached document provides a summary of the responses received during that consultation, which informed the development of the current draft.

We would welcome your comments on the attached Waste Strategy 2025–2035.

Please provide your feedback by 30<sup>th</sup> April. All responses received will be reviewed and considered ahead of the strategy's resubmission to Tynwald.

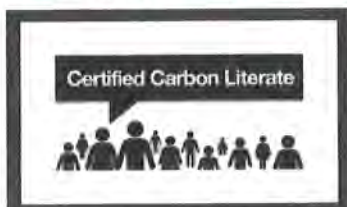
If you require any further information, or would like to discuss any aspect of the Waste Strategy in more detail, please do not hesitate to get in touch.

Thank you in advance for your engagement and input.

[REDACTED]  
Head of Waste Management (Interim) Bsc GMICE  
Waste Management  
Department of Infrastructure  
1<sup>st</sup> Floor, Sea Terminal, Douglas, Isle of Man, IM1 2RF  
[REDACTED]



bun-troggalys ~ shirveishyn raaldey





**Isle of Man**  
Government  
*Reilys Ellan Vannin*

GD 2025/0123

# Waste Strategy

**2025-2035**





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# PART 1

## 1.0 Introduction

The Isle of Man faces growing challenges in managing waste sustainably, efficiently and responsibly. Waste is created by every resident, business and sector on the Island, and waste management has direct implications for public health, environmental protection, economic development and climate resilience.

This Waste Strategy has been developed to ensure that the Island has a clear, coordinated and forward-looking approach to waste management over the next decade. This Strategy sets out how we will:



**Protect our environment** by reducing pollution, emissions and the negative impact of waste on natural resources.



**Support our economy** by enabling cost-effective waste services, encouraging innovation and creating opportunities for green growth.



**Meet our legal and international obligations** including commitments under the Basel Convention and the Climate Change Act 2021.



**Improve public services** by ensuring consistent, accessible, and high-quality waste collection, recycling and disposal options.



**Plan for the future** by investing in infrastructure, data and regulation that will support long-term sustainability and resilience.

The Strategy responds to the direction set out in *Our Island Plan: Building a Secure, Vibrant and Sustainable Future for Our Island*, approved by Tynwald in January 2022. It reflects the need for a waste system that is financially viable, environmentally sound, and tailored to the unique context of Island life.

Our overarching vision is:

**AS AN ISLAND WE AIM TO BE AS SELF-SUFFICIENT AS POSSIBLE IN MANAGING OUR WASTE IN AN ENVIRONMENTALLY AND ECONOMICALLY SUSTAINABLE WAY.**

This Strategy provides the framework to achieve that vision, guiding decision-making, investment and collaboration across Government, industry and the community.

## 2.0 Wastes covered by the Waste Strategy

UK legislation, including section 75(2) of the Environmental Protection Act 1990, defines waste as:

*"Any substance or object which the holder discards or intends or is required to discard".*

Waste streams are used to classify types of waste from individuals or organisations in this Waste Strategy:

- Household and similar commercial waste
- Industrial and other commercial waste
- Construction and demolition waste
- Hazardous waste from any source

### 3.0 Roles and Responsibilities in Waste Management

This table compares the roles and responsibilities of the Department of Infrastructure (DOI) and the Department of Environment, Food and Agriculture (DEFA) in relation to waste management. Local Authorities are primarily responsible for household waste collection under the Public Health Act. Some collect commercial wastes voluntarily via the Civic Amenity Sites and charge for this service.

Function	Department of Infrastructure (DOI)	Department of Environment, Food and Agriculture (DEFA)
<b>Strategic Planning</b>	Leads the development and implementation of the Waste Strategy, including infrastructure planning and service delivery models.	Develops environmental policy and legislation to support sustainable waste management and regulatory compliance.
<b>Infrastructure Management</b>	Oversees key waste infrastructure (EfW facility, landfills, transfer stations), ensuring operational efficiency and future capacity.	Provides planning decisions for waste infrastructure and ensures environmental risks are managed.
<b>Service Oversight</b>	Coordinates with Local Authorities on household waste collection and can apply performance standards and service levels.	Supports policy development with the DOI to promote waste prevention, reuse, and recycling, particularly in the commercial sector.
<b>Market Intervention</b>	Intervenes where market failure exists (e.g. small scale, monopolies) to ensure essential services are delivered.	Encourages compliance and innovation through proportionate regulation and guidance eg. difficult wastes such as AWCCT
<b>Environmental Regulation</b>	Ensures waste is directed to appropriate facilities and supports emissions reduction through EfW, reuse and recycling policies.	Issues waste licences, enforces environmental standards, and monitors compliance with waste regulations.
<b>Hazardous Waste</b>	Develops infrastructure for on-Island hazardous waste treatment and disposal.	Oversees classification, licensing, and safe handling of hazardous waste, including transfrontier shipment compliance.
<b>Data and Monitoring</b>	Collects and analyses waste data to inform strategic decisions and track progress.	Supports waste audits and data collection to evaluate environmental outcomes and policy effectiveness.
<b>Legislation and Standards</b>	May develop legislation to enforce service standards and waste acceptance criteria.	Leads on waste legislation, including adoption of European Waste Codes and classification of waste materials. <i>See appendix 2</i>
<b>Public and Industry Engagement</b>	Works with Local Authorities and contractors to deliver services and improve efficiency.	Consultation for legislation, regulations and guidance documents.

**Nothing within this strategy prevents the Department of Environment Food & Agriculture (DEFA) from undertaking its role as a regulator.**

## 4.0 Waste arisings

The term “waste arisings” refers to the total quantity of waste from a particular source over a period of time.

The waste arisings assessment consolidates information on the current extent, nature, and sources of waste which is necessary to underpin decisions for waste management.

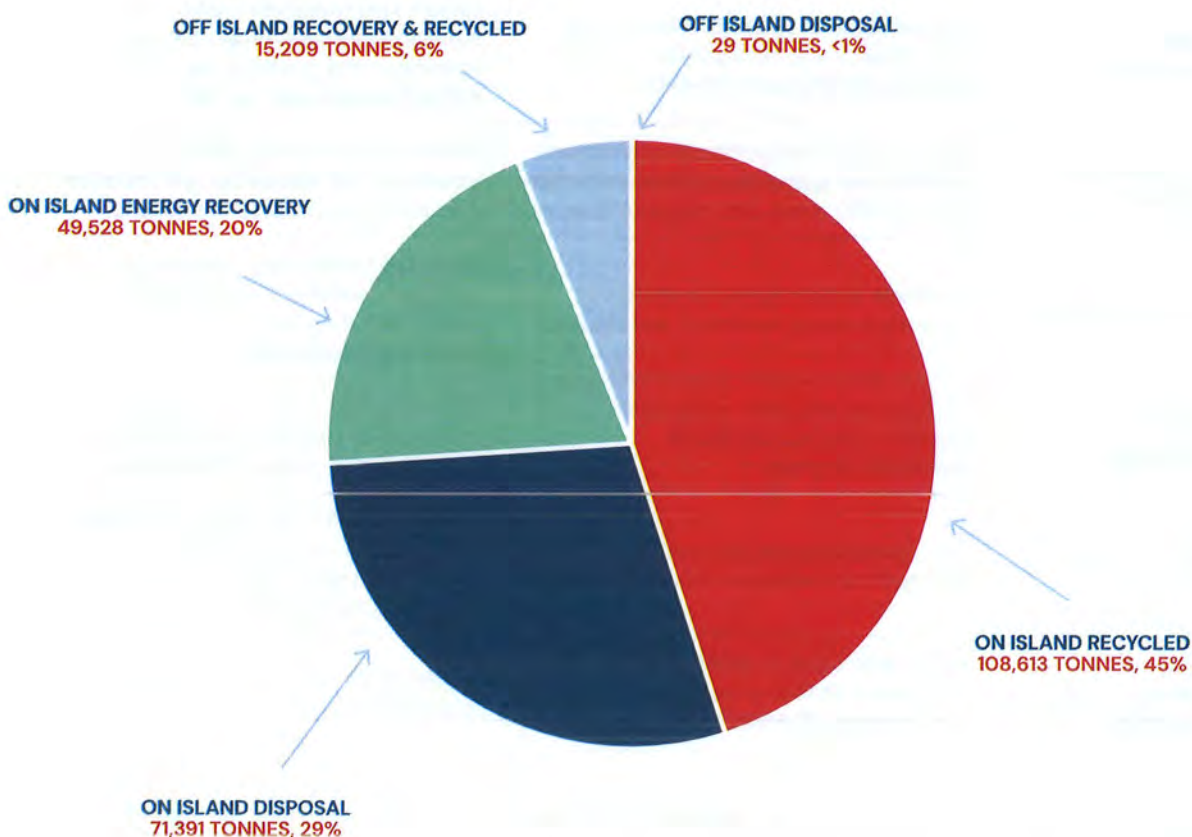
In 2024, the Island disposed of 244,770 tonnes of waste through the Island’s waste facilities operated and owned by either the Isle of Man Government and Local Authority operated Civic Amenity Sites or the private sector. A Waste Audit will be conducted Government prior to implementation of this Strategy, and then periodically after to monitor its effectiveness.

2024 DEFA Isle of Man Waste Returns Report - [Isle of Man Waste Statistics](#).

Not included in this tonnage are several unmonitored, legal recycling routes such as:

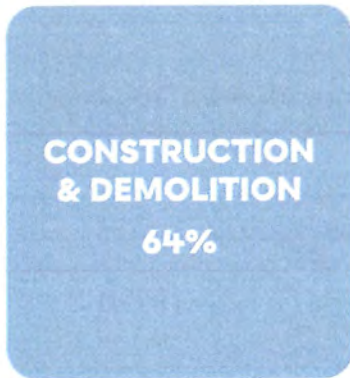
- Businesses back loading waste back to UK parent company for recycling.
- Demolition waste re-used on site for construction; and
- Demolition waste sent to alternative site for immediate re-use.

## WASTE DESTINATIONS 2024

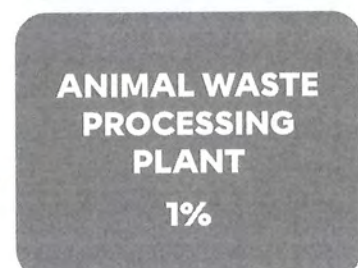
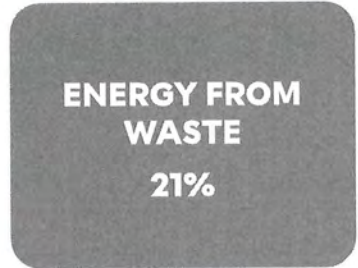


## Isle of Man Waste Flows & Infrastructure

### WASTE PRODUCERS



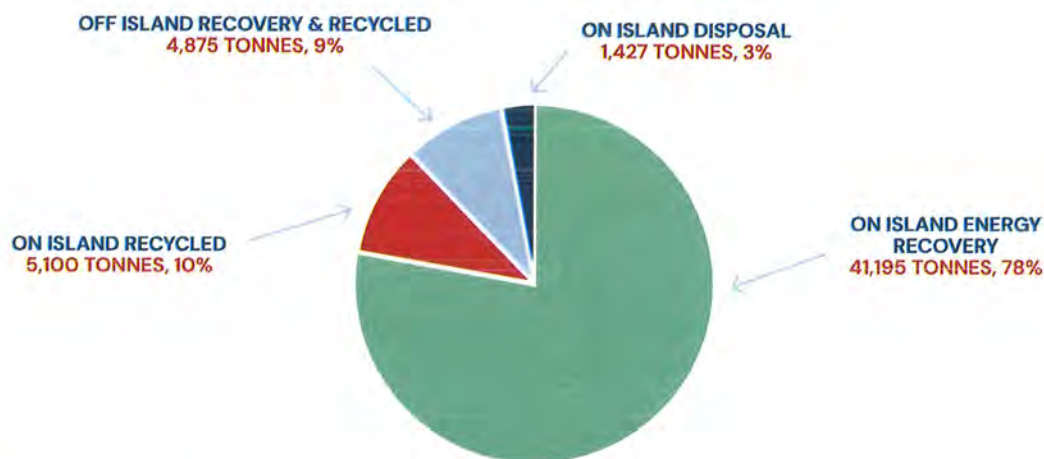
### WASTE RECEIVERS



## 4.1 Waste from households

In 2024, 20% (equating to 49,528 tonnes) of the Island's waste was classified as Household Waste. This includes waste collected from Households as refuse, kerbside recycling and waste from the Civic Amenity Sites. Of this, 78% of Household waste was sent to the Energy from Waste (EFW) facility, 19% was recycled and 3% of the waste was sent to landfill.

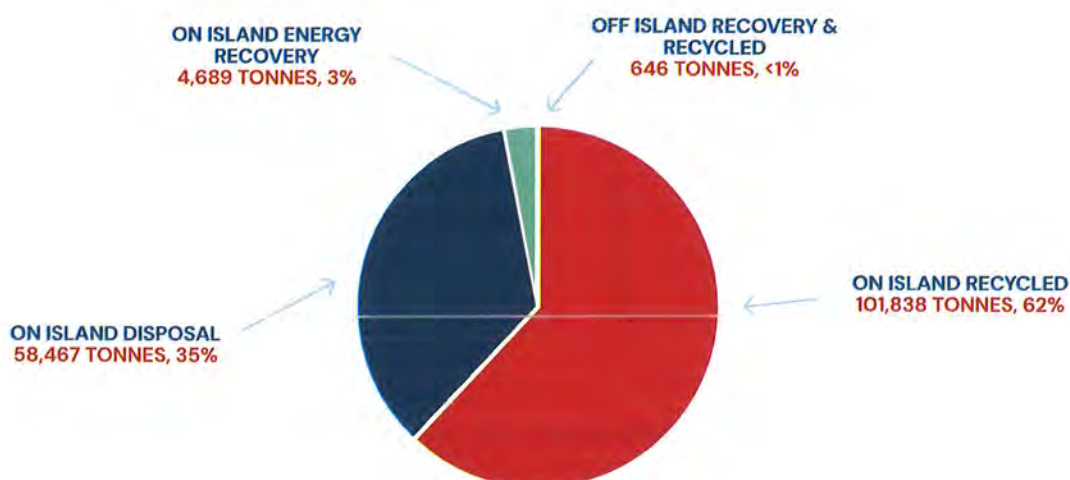
HOUSEHOLD WASTE DESTINATIONS 2024



## 4.2 Construction & demolition

The construction and demolition sector is the largest contributing sector to the total waste generation. This sector generated 165,641 tonnes of waste in 2024, accounting for almost two thirds (64%) of total waste generation. Of this tonnage 68% of the construction and demolition waste was recycled.

CONSTRUCTION & DEMOLITION WASTE DESTINATIONS 2024



## 4.3 Other waste arisings

The remaining 16% of waste arising was produced by the Island's commercial and industrial activities, sent to landfill, the Energy from Waste Facility, the Animal Waste Processing Plant or privately operated waste Transfer Stations for onward disposal or recycling.

## 5.0 Approach towards revising the Island's Waste Strategy for 2025-2035

The Isle of Man's Waste Strategy must consider waste streams from all sources; households, businesses, agriculture and industry. There 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
- Encourage new business to grow our green economy.

The Waste Strategy implementation is a 3-stage process that follows from the Waste Strategy Principles established following Public Consultation in 2024. These Principles will support a set of policies that are underpinned by the implemented Waste Strategy.

### PRINCIPLE AND GOVERNMENT POLICIES

The Strategy has been guided by Our Island Plan, the Isle of Man's international commitments such as the Basel Convention and legal requirements such as the Public Health Act and Climate Change Act. The Principles identified in the waste consultation and the response to that consultation have also played a part in the development of the strategy.

### WASTE STRATEGY

The Strategy sets out, in broad terms, the current waste management position and broad direction of decision making and our strategic objectives. The Strategy is informed by understanding the current waste industry and the Isle of Man economy. Good practice from other jurisdictions has shaped the Strategy ensuring good alignment with European and UK best practice whilst taking into consideration the uniqueness of delivering a comprehensive waste management system in an Island context.

### DEPARTMENT POLICIES AND LEGISLATION

The approval of the Strategy will inform decision making, policy development and the development of primary and secondary legislation within Government Departments.

The DoI will ensure that waste services are as cost effective as possible. This may require financial support from Central Government for essential waste services and associated infrastructure to support them. The Department will evaluate the overall climate impact of dealing with different waste streams to ensure that we make the best economic and environmental decisions about waste streams.

## 5.1 Operational Considerations

The Isle of Man Government will monitor the waste industry to ensure the social and economic requirements of the Isle of Man are met. Our general approach is that Government may invest to develop the infrastructure required for the good management of waste on the Isle of Man, however it is intended that Local Authorities and the private sector will continue to be the principal delivery partners.

## 5.2 Waste Strategy Principles

### ENVIRONMENTAL PROTECTION FIRST

Waste management decisions will prioritise the protection of the Island's natural environment, biodiversity public health and minimising pollution.

### SELF-SUFFICIENCY AND RESILIENCE

The Island will aim to manage as much of its waste as possible locally, reducing reliance on off-Island disposal and building resilience into waste infrastructure.

### WASTE HIERARCHY COMMITMENT

The Strategy will follow the waste hierarchy: reduce, reuse, recycling, recovery, and disposal—ensuring that landfill is always seen as the last resort.

### CIRCULAR ECONOMY ENABLEMENT

Waste will be viewed as a resource. The Strategy will support the development of circular economy models that keep materials in use and reduce the need for virgin resources.



### POLLUTER PAYS PRINCIPLE

Those who generate waste will bear the cost of waste management, encouraging more responsible production behaviours.

### DATA-DRIVEN DECISION MAKING

Waste audits and performance monitoring will underpin policy development, infrastructure investment and service improvements.

### EQUITY AND ACCESSIBILITY

Waste services will be designed to be accessible to all residents and businesses, regardless of location or sector, with consideration for rural and hard-to-reach areas.

### INNOVATION AND ECONOMIC OPPORTUNITY

The Strategy will support innovation in waste technologies and services, and promote green economic growth through reuse, recycling and energy recovery.

### SHARED RESPONSIBILITY AND COLLABORATION

Waste management is a shared responsibility across Government, Local Authorities, businesses and the public. The Strategy will foster collaboration and engagement to achieve its goals.

### COMPLIANCE AND BEST PRACTICE

The Strategy will align with international obligations and adopt best practice standards, modified where necessary to suit the Island's scale and context.

### EMISSION REDUCTION

Waste Management will work towards the emissions reduction targets in the five-yearly Climate Change Plans and the Climate Change Act 2021, considering whole lifecycle emissions for waste materials and waste management pathways.

# PART 2

## 6.0 Household Waste

Local Authorities are under a legal obligation through the Public Health Act 1990 to provide household waste collections to households and without exception this is undertaken. There is no legal requirement for Local or Central Government to collect recyclable waste or to provide a place for the deposit of household waste such as Civic Amenity Sites.

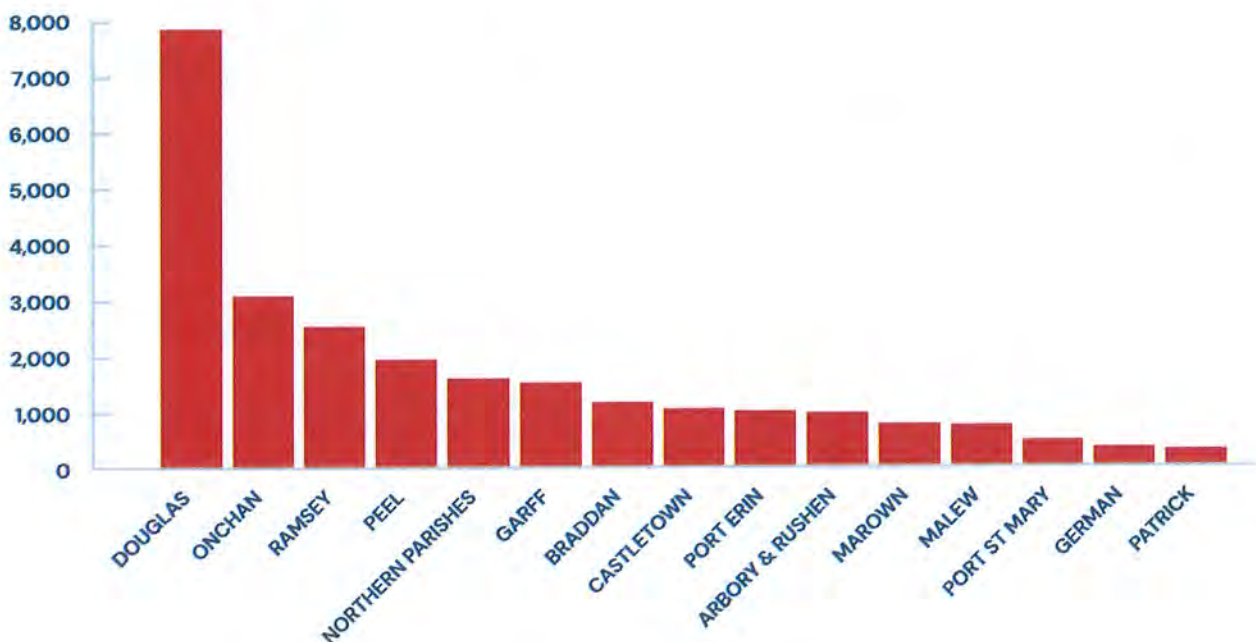
The Waste Strategy supports timely general waste & recycling collections either from the kerbside or via the provision of places for the deposit of waste in regions not suitable for kerbside collection such as Civic Amenity Sites and local drop banks.

Household waste collection is undertaken by Local Authorities through a combination of in-house and contracted out services. A few Authorities undertake kerbside recyclable collections mainly focused on materials that they have evaluated to hold a commercial economic value. The Local

Authorities provide regional Civic Amenity Sites. The four regional sites offer some opportunities for recycling, but the provision varies at different sites, is often targeted at economically advantageous recyclates, not necessarily focussed on environmental protection and emission reduction, and faces challenges to be accommodated operationally.

The economic and environmental outcomes of dealing with waste streams on the Isle of Man are not always straightforward and are frequently conflicting. This is particularly apparent for off-Island recycling pathways where the economic benefit of payments for recyclables results in emissions associated with transportation and reprocessing. Producing energy for the Island through the Energy from Waste facility and displacing the use of fossil fuels in some cases may be the best outcome. Work needs to be done to understand the optimal pathways for recyclable waste products arising on the Island when considering these variables.

### 2023 TONNAGE OF HOUSEHOLD WASTE COLLECTED BY LOCAL AUTHORITIES



## 6.1 Household General Waste Collection Services

Collection of general household waste from the kerbside is the legal responsibility of individual Local Authorities. They remain accountable for ensuring value for money for their rate payers. It is likely that rationalisation and combining of services would achieve further economies of scale, efficiencies and emissions reductions but this would be a matter for individual Authorities to negotiate with other Local Authorities.

There is limited governance of Local Authority functions in respect of efficiency and service, and no performance standards. The Department of Infrastructure has responsibility to accept the waste collected for disposal and, in this respect, it can instruct the Local Authorities where to deliver the waste (the Energy from Waste Facility).

### WASTE STRATEGY

- Local Authorities to remain responsible for kerbside household waste collection.
- In collaboration with Local Authorities, the Department of Infrastructure to explore the introduction of set service levels, waste acceptance criteria, and performance standards. This may include bringing forward new legislation to include powers to intervene if the services or standards are not being provided.
- Development of a waste service oversight model to report on compliance with defined performance standards

## 6.2 Civic Amenity Site Service

There is currently no statutory requirement for the provision of Civic Amenity Sites on the Isle of Man. The Local Authorities have traditionally undertaken this service through 4 regional organisations. Two sites are overseen by Joint Committees which are not legal entities and cannot enter contracts or employ staff. Two sites are operated by Boards that are legal entities, able to enter contracts and employ staff.

Service standards and provision differ at the four civic amenity sites. In some instances, recycling is undertaken where it is economically advantageous to do so, or there is a legal or regulatory requirement to do so e.g. to comply with Waste Electrical Electronic Equipment (WEEE) regulations. Recycling of some

materials may be a suboptimal outcome for the Isle of Man either economically or environmentally.

The provision of reuse centres is seen as an important facility for our communities. Reuse centres align closely with the principles of the waste hierarchy, which supports reuse over recycling. However, not all Civic Amenity Sites currently provide Reuse Centres.

The Department of Infrastructure believes that if the provision of Civic Amenity Sites is to be secured, then the provision of the service should be made a legal duty for the Local Authorities and measures put in place to ensure performance levels are being achieved.

In the UK, the cost of disposing of electrical goods is built into the purchase price through Producer Responsibility schemes. However, the Isle of Man does not currently receive any of these funds. This presents a challenge in managing Waste Electrical and Electronic Equipment (WEEE). To address this, the Strategy proposes that Civic Amenity Sites incorporate reuse centres where electrical goods are collected separately for reuse, recovery or recycling either on or off island. Funding for this service should be built into the local authority rates system and reflected in the Amenity Site service standards.

### KEY WASTE STRATEGY PROPOSALS

- Department of Infrastructure to introduce service levels for civic amenity sites.
- Development of a waste service governance and oversight model to report on compliance with defined performance standards.

## 6.3 Enabling householder recycling

Local Authorities are responsible for developing local recycling services which enable and encourage householders across the Island to recycle household waste items that should not be entering the household waste stream into the EfW.

There are currently some kerbside collection services undertaken by Local Authorities, but the service is not available across the Island. The service focuses on items that are of economic advantage to the Local Authority and, in some cases, the result for the Isle of Man may be environmentally suboptimal. One example of this is paper recycling, as whilst the Local Authority gains some income from collecting and transporting paper for recycling, the Island loses calorific value from the Energy from Waste plant and therefore operates less effectively increasing the carbon emissions associated with waste recovery.



Furthermore, the recyclate market price is highly volatile and so the perceived economic benefit can be miscalculated as markets fluctuate. The Department supports the use of kerbside recycling to increase the proportion of household waste being recycled by making it more convenient. The products collected should be reviewed to maximise the opportunity to protect the environment by taking out of the waste stream undesirable items such as batteries and vapes and other small WEEE.

Recycling can be problematic in apartments and flats that do not have appropriate communal facilities for storing recycled materials. Consideration should be given to how facilities can be retrospectively provided and building standards amended to ensure adequate facilities in new builds and renovations wherever possible.

For areas that are not suited to kerbside recycling collections, especially those in rural areas or where the street layout precludes the use of kerbside bins or collecting vehicles, Local Authorities should consider the use of drop banks for key recyclates, to encourage behavioural changes that can lead to an increase in recycling.

#### KEY WASTE STRATEGY PROPOSALS

- Local Authorities to remain responsible for delivering schemes to encourage the recycling of materials by householders
- Department of Infrastructure to introduce service levels, waste acceptance criteria and performance standards.
- Development of a waste service governance and oversight model to report on compliance with defined performance.

- A review to be undertaken of the appropriate items to be collected at the kerbside to minimise environmental damage. The outcome of the review to be used to inform service levels and performance standards.

## 7.0 Waste Strategy for Waste Prevention & Reuse

By reducing or eliminating waste generation, the Waste Strategy supports efforts to promote a more sustainable society. Waste minimisation involves redesigning waste processes and/or changing societal patterns of consumption and waste production where necessary and relates to processes based on the Island. Waste minimisation is also driven by process changes in the UK, especially for goods brought to the Island.

Businesses that generate waste will usually seek to minimise waste as waste disposal is a business overhead. Previous versions of our Waste Strategy have focussed more on the handling of household waste than commercial waste. This strategy seeks to include commercial waste in the future and DoI will work with DfE to support waste prevention and waste reuse measures within the business and construction sectors.

#### KEY WASTE STRATEGY PROPOSALS

- DEFA and the DoI to consider tools to promote waste prevention and reuse including financial such as subsidised recycling for some waste streams, gate fees, landfill tax and supporting legislation.

- Re-establishment of a Waste Forum to engage and collaborate with industry and the community.
- DoI to work with DfE to ensure appropriate guidance is provided for commercial businesses regarding reduction of waste, use of available waste streams and to develop reuse pathways.

## 8.0 Waste Recycling

The Strategy supports and encourages creating less waste for disposal by increasing awareness of the need to recycle materials that have an environmental benefit in the context of the Isle of Man. Most recycling and reuse material is construction and demolition waste and metal. This is undertaken by the private sector in the main and it appears to be a functioning market without the need for significant intervention by Government. Government does have a role in regulating these activities. This strategy commits to maintaining up to date regulations advice and enforcement.

**DEFA WILL CONTRIBUTE TO THE REGULATION OF WASTE STREAMS, SUCH AS SINGLE USE PLASTICS.**

In respect of some construction and inert waste, there are still however some economic incentives to landfill.

There are some demand-side drivers that have been implemented in the UK that may help increase the value of recycled materials, for example large construction projects in the UK are legislatively required to use a percentage of recycled materials. Materials such as recycled aggregate products displace the use of virgin materials being quarried from the ground.

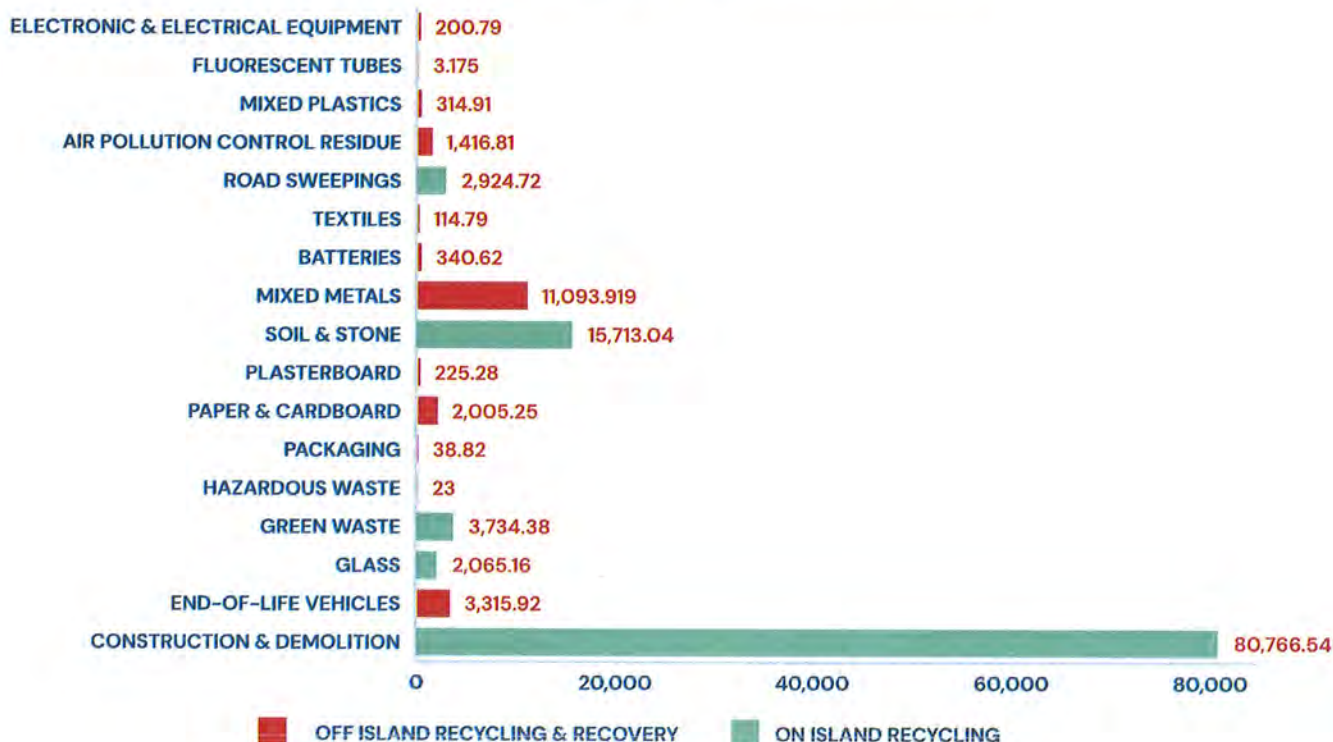
Expansion of recycling from both households and businesses across the Island will support the collection of waste streams that should not enter the EfW plant (metals, batteries and glass) and of waste streams that have a high circular economy value such as textiles.

Bottom ash from the Energy from Waste Facility is routinely landfilled and we will move to a future where this ash is recycled and reused on the Island.

### WASTE STRATEGY AIM

- We will work to make it easier for recycling to be the first choice after reuse providing improved recycling options for households, businesses and industry.

### 2023 TONNAGE AND TYPES OF WASTE RECYCLED



KEY WASTE STRATEGY PROPOSALS

- Expand recycling provision, either kerbside or local drop banks to all areas by making it a duty for Local Authorities to recycle materials that have an environmental and economic benefit in the context of the Isle of Man.
- Review the most appropriate materials for recycling collection, targeting those which present the greatest environmental risk and/or carbon footprint.
- Tools to be developed by the DOI and DEFA requiring construction projects to increase the use of recycled materials.
- DOI to consider the introduction of a land fill tax to promote separation and recycling of challenging materials such as mixed demolition waste.
- DOI to recycle incinerator bottom ash for use as an aggregate replacement.

## 9.0 Waste Strategy for Energy from Waste

The Waste Strategy supports efficient energy recovery from residual waste. Energy from waste is recognised as the best management option for our household waste. Using this waste as a fuel plays a crucial role in reducing the requirement to landfill waste and reduces

fossil fuel use. The EfW operators comply with current best available practice for environmental compliance and emissions from energy from waste continue to be treated, monitored and publicly reported.

Last year the EfW waste plant produced 25,500 megawatt-hours or 10% of the Island’s electrical energy supply through energy recovery of residual waste, this equates to 50,000 tonnes of waste. This annual amount of residual waste diverted from landfill, in terms of volume, would be 100,000m<sup>3</sup> based 2m<sup>3</sup> per compacted tonne. Energy recovery from waste reduces the use of fossil fuel required for electricity generation. Using our waste for electricity has saved not only landfill capacity but also resulted in a saving of 13,260 tonnes of coal or 7.7 million litres of petroleum or 5.36 million m<sup>3</sup> of natural gas.

As a strategically important asset, the Government will operate the primary incinerator at the Energy from Waste Plant until at least 2039. This operation model has worked well for the past 20 years.

This strategically important facility has been traditionally underutilised. The Government will take steps to ensure that the facility is maximised to produce as much green energy as possible. This will be achieved both by ensuring that appropriate waste streams are directed to the facility, and using sustainable biomass derived from the Island’s plantations.

ENERGY FROM WASTE RESIDUE WASTE LEVELS 2013 TO 2023



## WASTE STRATEGY

- Fully exploit the capacity of the Energy from Waste Facility by increasing the amount of on-Island waste being incinerated and burning sustainable biomass waste from the Island's plantations.
- Extend the operational life of the primary Energy from Waste facility until at least 2039.
- As an interim position we will continue to landfill waste derived bottom ash at a fully engineered and lined landfill site.
- Develop an on-Island process for stabilising incinerator bottom ash for use as aggregate replacement in the construction sector.

## 10.0 Hazardous Waste

Several hazardous wastes are produced by industry and schools (from lab work) on the Island. Most of this waste is liquid, and it is currently shipped off Island for treatment, reuse or disposal. This is undertaken through a UK Transfrontier Shipment Notice, which is expensive for industries and schools. Though our international commitments allow shipment off the Island, this is only allowed in cases when it is unreasonable for the Island to deal with the waste locally.

It will be practical to deal with some of these wastes locally at the Energy from Waste Plant's proposed new hazardous waste incinerator. Industry and the Government will seek to use this waste disposal route to reduce the need for waste export. This will require a change to the Braddan Planning Scheme Order. The Basel Convention includes a clear principle that countries should manage and dispose of their own hazardous and other wastes within their own territory wherever possible. It is important to comply with international treaties and non-compliance may result in restrictions of waste export to the UK. Therefore, it is necessary for the Government to plan to be as self-sufficient as reasonably possible and secure alternative disposal routes.

This strategy seeks to expand hazardous waste processing on Island. The Hazardous Waste Facility will be replaced with a new facility that will ensure a safe disposal route to until at least 2039. The replacement of this facility will bring a further opportunity for the Island to comply with its obligations under the Basal Convention.

End of life and damaged electric vehicles are a relatively new waste stream on the Isle of Man. Battery recovery requires capital intensive purpose-built industrial facilities. The Isle of Man will not have the numbers of vehicles required to support

the construction of such a facility at this time. In some circumstances the batteries, and possibly the whole car, will have to be shipped off Island for reprocessing. However, ongoing training is being provided to allow technicians to assess and make safe EVs for easier transport. This Strategy recognises this pressing issue. The Department will continue to work with the industry to identify appropriate measures to address current and future need in this emerging waste sector for the Island.

There are an increasing number of household items that contain lithium-ion batteries. Many of these are small and easily discarded into household waste, which presents safety and environmental risks. It is necessary for us to provide clear and easy to access alternative routes for disposal. As we move towards an electrified future, the use of batteries will increase and demand for these routes will increase. The need for recovery of rare earth metals from electronic goods will also continue to grow.

As Transfrontier Shipments of mixed waste becomes increasingly more challenging, it will be necessary to develop the capacity to separate key materials from general household waste.

Coal Tar Waste contaminated material is present in many locations around the Island. The Department is developing treatment protocols for Asphalt Containing Coal Tar Waste (ACCTW) that will allow this material to be safely reused as an aggregate substitute. To support both Government and the construction industry, we will provide a suitable storage facility at Turkeylands that allows for safe management of ACCTW prior to specialist processing and reuse.

## WASTE STRATEGY

- Develop the new Hazardous Waste Incinerator to safely dispose of appropriate hazardous materials and clinical waste on Island, operational until at least 2039.
- Develop schemes for households to dispose of hazardous household wastes and recycle rare earth metals away from the general waste stream.
- Identify hazardous waste that can be incinerated in the new hazardous waste incinerator and apply to amend the Braddan Planning Scheme Order accordingly.
- DOI and DEFA's Environmental Protection Unit to implement appropriate waste operations licences or directions as required to support modern current regulations and best practice.
- DOI and DfE to support industry in the development of a storage and disposal route for end-of-life electric vehicles.



- DOI and DfE to support industry in the development of a storage and disposal route for end-of-life batteries.
- DOI to develop Coal Tar Waste storage and reprocessing to support infrastructure projects and construction industry.

## 11.0 Waste Landfill

The Strategy recognises that we will continue to need landfill facilities for some hazardous, non-hazardous, and inert waste. Such materials are likely to include:

- Hazardous wastes – eg. asbestos
- Pre-treated industrial wastes from which no further resources can be recovered.
- Waste for which the alternatives to landfill cannot be justified on economic, environmental or resource efficiency grounds.

The Island has two operational landfill sites owned by the Department of Infrastructure; Wrights Pit North accepts asbestos, plasterboard and contaminated soil

and stones, and Turkeylands landfill which accepts non-hazardous and inert wastes such as construction and demolition waste and the Energy from Waste Incinerator Bottom Ash. Both Wrights Pit North and Turkeylands will be full within the next 5 years.

The Isle of Man Government will ensure that the Island has appropriate landfill capacity for the appropriate disposal of solid wastes, which cannot be recovered, or recycled. The Government will construct a new landfill facility at Turkeylands, which will be engineered to modern European standards. Some of the cells will be fully lined. This will create a site which does not leave a dilute and disperse legacy issue for future generations. The new landfill facility at Turkeylands is anticipated to have a lifespan of around 20 years. However, implementation of measures contained in this strategy will increase the lifespan by diverting material from landfill through recycling and re-use. An inert waste landfill facility will remain available at Turkeylands.

In respect of bottom ash from the Energy from Waste Facility, Government will look to recycle the ash and use it in suitable construction projects as

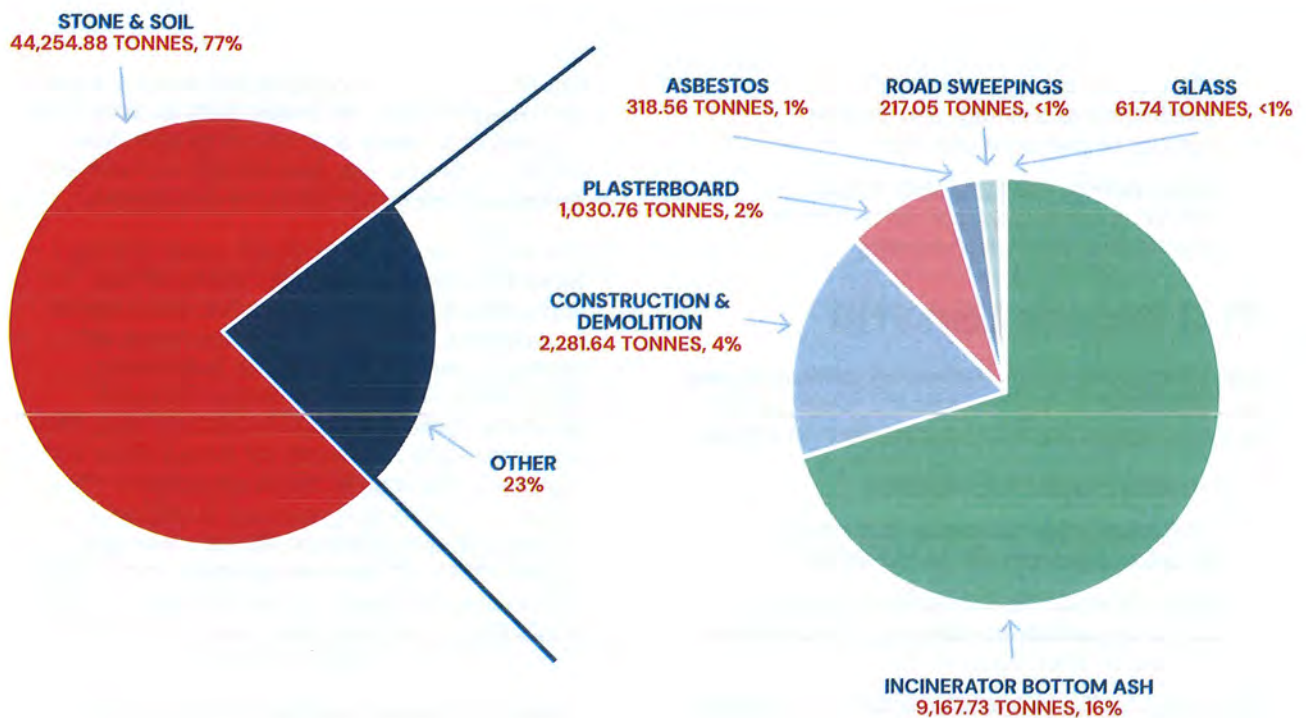
a virgin aggregate replacement. Until the process is established, we will continue to store the waste in the Old Turkeylands Landfill Site where it has been held for the last 20 years. In time, this facility will be used for treatment and storage ahead of reuse. Following a recent consultation with DEFA a Certificate of Lawful use will be requested by the Department of Infrastructure.

We have limited space available for landfill, so it is critically important that it is only used for materials where there is no other option. In the short term the Department of Infrastructure will use disposal prices to encourage reuse and recycling. Mixed waste is a particular problem, but one that must be addressed by the construction and demolition industries who need to be encouraged to separate

waste streams. If required, some waste will be restricted from being deposited at Government facilities. The Department of Infrastructure will consider where waste can be re-used, recycled or recovered and how this could be encouraged by the introduction of a landfill tax to ensure that waste producers are financially incentivised to maximise recovery and recycling over landfill.

Additionally, the Isle of Man Government will implement changes to Regulations and working practices to seek innovative methods to encourage the processing of waste into new products after appropriate processing. For example, the sediment from Peel Harbour will be processed to lock in the heavy metal content and the residual material used to remediate industrial sites.

## 2023 TONNAGE AND TYPES OF WASTE SENT TO LANDFILL



## WASTE STRATEGY

- Development of new landfill and recovery storage and processing facilities at Turkeylands Quarry.
- Process incinerator bottom ash for reuse in construction projects.
- Implement restoration and closure plan for Wrights Pit North.
- Impose higher disposal fees on waste that could be recovered or recycled.
- Investigate the creation of a Landfill Tax to ensure that there is an economic drive for reuse, recovery, and recycling over landfill.

## 12.0 Waste Strategy for Waste Regulation

The Strategy supports a regulatory framework for the waste sector to protect human health and the environment. Regulations should provide a level playing field for a market in which legitimate businesses can operate and invest with confidence. Regulation and enforcement will be proportionate to the risks. Regulatory standards will only be introduced following consultation. The Island's geographical remoteness and size mean that implementing good practice legislation from the UK or Europe can be disproportionately expensive and/or challenging. Government will consider the economic impact and time required for implementation as part of any policy being approved by the Council of Ministers to implement new best practice.

Government will adopt the use of European Waste Codes in all waste-related work. Consideration will be given to tracking waste from creation to final treatment or disposal. This work will underpin the development of future policies to address waste reduction, reuse and recycling.

The adoption of Best Available Technology will be modified to reflect both the risk and Island's economic situation. Cost will be an allowable consideration in terms of the appropriate technology to be deployed, but on a risk-based basis.

Consideration will be given to legislatively ensuring that end of life remediation funding is ringfenced through the operational life of landfill facilities, such that those funds cannot be controlled or used for any other purpose by the business.

Legislation will be brought in to enable waste material to be classified as non-waste after undergoing an appropriate treatment and being available to be reused. We will continue to monitor evolving methods and treatments for hazardous waste.

## UK LEGISLATION

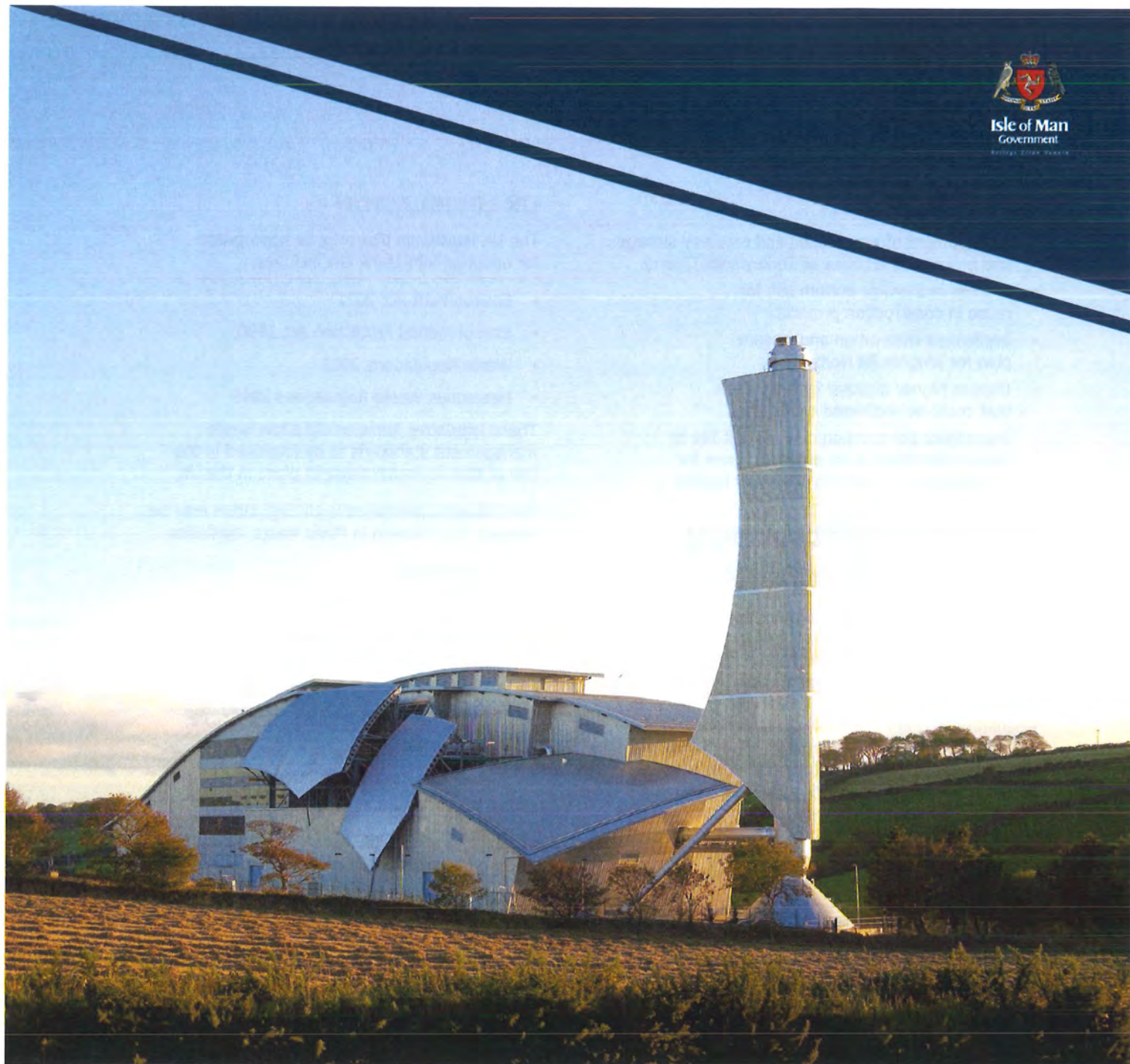
The UK legislation that may be appropriate for adoption into Manx law includes:

- Environment Act 2021
- Environmental Protection Act 1990
- Waste Regulations 2011
- Hazardous Waste Regulations 2005

These legislative items would allow waste management standards to be improved in the Isle of Man to match those in place in the UK.

The following provisions in UK legislation may be relevant for inclusion in Manx waste legislation:

- Waste Strategy
- Waste Management Plan
  - ◊ Analysis of current waste management situation
  - ◊ Contents
  - ◊ Periodic review
- Waste hierarchy
- Waste Reduction, & Prevention
  - ◊ Waste authority requirements
  - ◊ Measures to prevent waste generation
  - ◊ Waste prevention programme – monitoring & evaluation
- Waste Management responsibility
  - ◊ Treatment of waste responsibility
  - ◊ Cost of waste management
  - ◊ Polluter-pays principle
- Waste collection
  - ◊ Duties of waste authority
  - ◊ Receptacles for household waste
  - ◊ Recyclable household waste collected separately
  - ◊ Separate collection of recyclables from industrial and commercial waste
  - ◊ Payment for collection, recycling, and disposal of waste
  - ◊ Non-compliance fines
- Hazardous Waste
  - ◊ Provisions for specific types of hazardous waste
  - ◊ Measures for waste oil
  - ◊ Coal Tar Waste



## WASTE STRATEGY REGULATION

- DEFA, working with the DoI, is to strengthen waste legislation in an appropriate and proportionate way.
- Extend statutory responsibilities with respect to waste and clearly define these responsibilities with appropriate consequences for failure.
- Work with Local Authorities and Civic Amenity sites to set service standards for waste, this may be accompanied by legislative powers to intervene if services or standards are not being provided.
- DEFA to provide clear standards and guidance for planning approval in relation to size, space requirements, risk, and other constraints for waste operations.
- Strategic and Local Area Plans to ensure future waste facilities are identified and accommodated.
- DEFA will produce a legislative route which will include guidance on processing and using waste such that it becomes a by-product at the point of use.
- DEFA to consider introducing a Waste Duty of Care Code of Practice.
- Legislation to require provisions to be ringfenced for landfill site remediation to be developed and implemented.
- Government to adopt the use of European Waste Codes in all appropriate approvals, licences, permissions, and directions.

# PART 3

## 3.0 Delivery Framework

To realise the vision of a sustainable and self-sufficient waste management system, the Delivery Framework will outline how strategic objectives will be implemented across the Island. This framework ensures that actions are coordinated, resourced, and tracked effectively.

### 3.1 Key Delivery Components

#### Infrastructure Development

- Investment in essential infrastructure such as Civic Amenity Sites, recycling centres, reuse hubs and hazardous waste facilities will be prioritised based on the Annual Statement of Need and waste flow data.

#### Local Authority Collaboration

- Delivery will be coordinated with local authorities to ensure consistent service standards, equitable access to facilities and alignment with national targets.

#### Public Engagement and Education

- Campaigns and educational programmes will be delivered to promote waste reduction, reuse and recycling behaviours.

#### Policy and Legislative Support

- Delivery will be underpinned by updated legislation and technical guidance to support innovation, compliance, and enforcement.

#### Operational Efficiency

- Waste collection, sorting, and processing systems will be optimised to reduce costs, improve service quality and minimise environmental impact.

#### Funding and Resource Allocation

- Delivery will be supported by a clear funding strategy, ensuring resources are allocated to priority areas and projects with measurable impact.

#### Partnerships and Innovation

- Collaboration with private sector, third sector, and academic institutions will be encouraged to pilot new approaches and technologies.

## 3.2 Next Steps

To ensure the successful implementation of the Waste Strategy, the following next steps are recommended:

#### Establish Governance Structures

- Define oversight responsibilities and reporting mechanisms.

#### Initiate Baseline Assessments

- Conduct a comprehensive Island-wide Waste Audit.
- Launch a Household Waste Survey to inform service design and future targets.

#### Legislative Preparation

- Continue drafting necessary legislative changes, including updates to planning schemes, service standards, and other proposals.
- Review UK and EU waste legislation for potential adoption into Manx law.

#### Infrastructure Planning

- Finalise plans for the new hazardous waste incinerator and landfill facility at Turkeylands.
- Develop proposals for reuse centres and expanded Civic Amenity Site services.

#### Engage Stakeholders

- Coordinate with Local Authorities to agree waste standards and uniform services, expanding kerbside recycling where practical.
- Engage with businesses and industry to promote waste minimisation and circular economy practices.

#### Public Communication

- Launch public education campaigns to raise awareness of recycling, reuse, and hazardous waste disposal.
- Promote behavioural change through accessible services and clear messaging.

#### Monitoring and Evaluation

- Define key performance indicators (KPIs) and reporting frameworks.
- Schedule periodic waste audits (e.g., at years 1, 5, and 10) to assess progress and inform strategy updates.

#### Innovation and Adaptation

- Explore emerging technologies such as bioreactors and district heating systems.
- Monitor evolving waste streams and adjust the strategy to remain responsive and effective.

# Annex 1 - Waste disposal options and destinations

Waste Type	Household			Public Sector		Business		Isle of Man					UK	
	Refuse Collection	Kerbside	Civic Amenity Site	Refuse Collection	Other <sup>1</sup>	Refuse Collection	Other <sup>1</sup>	EFW <sup>2</sup>	AWPP <sup>3</sup>	Recycle	Transfer Station	Landfill	Recycling/Recovery	Disposal
Animal							x	x	x					
APCR4							x							
Asbestos			x		x		x				x	x		
Batteries					x		x				x		x	
C&D5					x		x			x	x	x		
Cardboard					x		x				x		x	
Clinical					x			x						
Electrical goods					x		x				x		x	
End of Life Vehicles			x		x		x				x		x	
Fluorescent Tubes					x		x				x		x	
Food	x			x		x		x						
Gas cylinders			x <sup>6</sup>		x <sup>6</sup>		x <sup>6</sup>						x	x
Glass			x		x		x			x	x			
Green waste					x		x			x	x			
Hazardous Waste			x		x	x								
IBA7			x											
Metals		x	x		x		x					x	x	
General waste	x			x		x		x						
Oil					x		x	x	x <sup>8</sup>					
Packaging					x		x				x		x	
Paper					x		x				x		x	
Plasterboard					x		x				x	x	x	
Plastics		x			x		x				x		x	
Sludge					x			x						
Soil & Stone					x		x			x	x	x		
Textiles										x				
Tyres					x		x	x			x			
Wood					x		x	x		x	x			

## REFERENCES:

1 Waste operators and waste types accepted can be found: [https://www.gov.im/media/1387057/wd\\_register\\_2025\\_v1.pdf](https://www.gov.im/media/1387057/wd_register_2025_v1.pdf)

2 Energy from Waste  
3 Animal Waste Processing Plant

4 Air Pollution Control Residue  
5 Construction & Demolition

6 Gas cylinders to be returned to supplier  
7 Incinerator Bottom Ash

8 Accepts cooking oil  
9 Only Isle of Man Creamery milk carton



**Isle of Man**  
Government

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**Email: [WasteManagement.DOI@gov.im](mailto:WasteManagement.DOI@gov.im)**

# DEPARTMENT OF INFRASTRUCTURE

## Principles for the Waste Strategy

### Consultation Feedback



**Isle of Man**  
Government

*Reillys Ellan Vannin*



### Principle - Waste Collection Optimisation

Each Local Authority is responsible for their own area and 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. Optimising collection routes and standardising refuse collection vehicles through a centralised service could assist in reducing emissions to achieve the Isle of Man Climate Change Plan 2022-2027 objective.

Question in the public consultation - **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?**

Responses:

Option	Total	Percent
Strongly disagree	94	14.18%
Disagree	70	10.56%
Neither agree nor disagree	59	8.90%
Agree	185	27.90%
Strongly agree	234	35.29%
I don't know	14	2.11%
Prefer not to say	3	0.45%
Not Answered	4	0.60%

### Principle - Prevention & Minimisation

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.

Question in the public consultation - **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?**

Responses:

Option	Total	Percent
Strongly disagree	55	8.30%
Disagree	39	5.88%
Neither agree nor disagree	55	8.30%
Agree	206	31.07%
Strongly agree	291	43.89%
I don't know	11	1.66%
Prefer not to say	2	0.30%
Not Answered	4	0.60%

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.

Question in the public consultation - **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?**

Responses:

Option	Total	Percent
Strongly disagree	30	4.52%
Disagree	25	3.77%
Neither agree nor disagree	51	7.69%
Agree	297	44.80%
Strongly agree	211	31.83%
I don't know	41	6.18%
Prefer not to say	3	0.45%
Not Answered	5	0.75%

#### 4Principle – Landfill

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.

Question in the public consultation - **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?**

Responses:

Option	Total	Percent
Strongly disagree	46	6.94%
Disagree	68	10.26%
Neither agree nor disagree	74	11.16%
Agree	292	44.04%
Strongly agree	137	20.66%
I don't know	35	5.28%
Prefer not to say	4	0.60%
Not Answered	7	1.06%

#### Principle - Waste Regulation

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.

# 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)

## 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
<p><b>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:</b></p> <ul style="list-style-type: none"> <li>• <b>The primary and secondary legislation on the Isle of Man does not currently support centralised collection, treatment or disposal of waste.</b></li> <li>• <b>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.</b></li> <li>• <b>This will further erode the role of local government.</b></li> <li>• <b>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.</b></li> <li>• <b>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</b></li> </ul>	

**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
<p><b>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.</b></p>	

## 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.**

## Ross Phillips

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**From:** Ross Phillips  
**Sent:** 24 March 2026 09:44  
**To:** Ross Phillips  
**Subject:** FW: The Manx Family Community Centre FAO Onchan Commissioners  
**Attachments:** Letter 6 March 26 to Clerk of Commissioners\_.pdf

**From:** [REDACTED]  
**Sent:** 06 March 2026 16:56  
**To:** Ross Phillips <[rossphillips@onchan.org.im](mailto:rossphillips@onchan.org.im)>  
**Cc:** [REDACTED]  
**Subject:** The Manx Family Community Centre FAO Onchan Commissioners

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Ross

Please find attached a letter to your good self and the commissioners.

Have a great weekend

Kind regards

[REDACTED]  
Director  
[REDACTED]



The Manx Family Community Association Limited Isle of Man Registered Charity No 1153. Isle of Man registered company ( limited by guarantee and having no shares ) No 128447C reg office. 8 St Georges Street Douglas Isle of Man IM1 1AH

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**THE MANX FAMILY COMMUNITY ASSOCIATION LIMITED**

Ross Phillips  
Chief Executive/Clerk  
Onchan District Commissioners  
Hawthorn Villa,  
Main Road,  
Onchan,  
IM3 1RD

March 6<sup>th</sup>, 2026.

Dear Ross

Further to the press release posted yesterday and our correspondence of 24<sup>th</sup> February 2026 we wanted to state that we understand that the Commissioners have a duty to support the library services within their area and we would not wish to be seen to undermine this aspect. Indeed, we work with other libraries to assist each other in relation to availability of stock across all media.

Since taking over the services in October it has been a challenge to see where and how we as Trustees of the charity can meet our commitment to provide for the Island.

Onchan is not an official stop for the mobile library as that would challenge your own services. However, the mobile library does visit Onchan to provide home visits where those who cannot get out can obtain books. Also, the Treasured Memory service is available and has been used at Haywood Court in the past and is available to give sessions to assist those who would benefit - this can range from the Hospice to nursing and care homes and where a trip down memory lane can unlock more than just memories but encourage interaction. Many young families also attend the Manx Family Centre for events, especially during school holidays.

The Manx Family Community Association Limited.  
A Company limited by Guarantee Registered in the Isle of Man Reg Number 128447C and  
Charity registered in the Isle of Man Number 115.  
Registered Office 8 St Georges Street Douglas Isle of Man IM1 1AH.  
Directors and Trustees J.L. Thompson, K. N. Freestone, N.S. Leonard -Morgan



## THE MANX FAMILY COMMUNITY ASSOCIATION LIMITED

Mums with young babies take advantage of certain classes which help and support both the child and the mother, giving them the opportunity to speak to others experiencing the same challenges as themselves, i.e. sleepless nights.

Language classes are also held for people across Island to boost the language skills of all those interested in specialist educational projects as well. We also have a mental health initiative and are working actively with Manx care to see how we can benefit the Islands community.


So, it is not just as a mobile library nor even a library, but the Manx Family Community Centre based in Douglas, but reaching Island wide and will be increasing that reach over the coming months.


If you hear of anyone or any organisation that would be interested in any of these then please let us know.

Many thanks for your time and patience and we hope that we can continue collaboration together and to be able to meet you in person at the Centre in the near future.

Kind regards

Yours sincerely

  
Director and Trustee

  
Director and Trustee



**Mrs Emily Curphey  
Chief Officer**

To all Local Authorities boards and committees

Contact: [REDACTED]  
Telephone: [REDACTED]  
Email: [REDACTED]  
Date: 19/03/2026

Dear Clerk,

I am writing to update you on the Department's position regarding the Local Government (Amendment) Bill 2023, and particularly clause 5 (formerly known as New Clause 1).

Further to the adjournment on Tuesday 10 March, which was agreed to allow myself to provide an additional briefing to Members of the House of Keys regarding my intentions in relation to the amendments submitted from the Legislative Council.

I would like to take this opportunity to thank the Local Authorities (of which 19 of the 21 Authorities held meetings with myself and my officers over a 4-week period in February and early March.) for meeting with us recently.

The Local Authorities will be aware that clause 5 was introduced in part to address issues surrounding the Northern Civic Amenity Site; however, the Department has been looking to see if those issues can be resolved through alternative methods, e.g. a joint board order under section 7 of the Local Government Act 1985. The Department are currently out to consultation with the Northern Local Authorities on a draft Order to make a Northern Civic Amenity Board. It is hoped that this will be brought to May Tynwald for approval. That Order will be premised on the fact that all members of the Board will pay towards the running of the site (apart from the Department who will be a voting member of the Board). It is therefore clear that we have arrived at a new solution to these issues which removes the need for a divisive clause such as Clause 5.

In light of the comments received from the Local Authorities and the potential alternative approach in dealing with those issues, I believe clause 5 is now unwarranted. The Department, in conjunction with the Secretary of the House of Keys, has been exploring how clause 5 can be removed from the Bill.

You will note that a revised motion is attached to this letter; this letter hopes to explain the mechanics of the proposed motion.

The first part of the motion relates to the suspension of standing orders. The reason for this is because standing order 4.13(3) only allows the House to

- (a) agree with the Council's amendments; or
- (b) disagree with the Council's amendments; or
- (c) amend the Council's amendments; or
- (d) disagree with the Council's amendments with a view to a conference

It does not allow the House to reconsider previously agreed clauses. Therefore, in order to reconsider the principle and detail of clause 5, the suspension of standing orders is required.

The motion at item 1.2 is split into three parts.

The first part relates to the rescinding of the House's order of 28th January 2025 that New Clause 1 be approved in principle and its order of 11th February 2025 that New Clause 1, as amended, stand part of the Bill. The effect of this part of the motion would result in the removal of clause 5 (formerly known as New Clause 1) from the Bill.

The second part of the motion deals with consideration of the Legislative Council's amendments 5 to 11 (inclusive) and the third part deals with the renumbering of clauses, which is consequential to the removal of clause 5 from the Bill.

I hope this provides sufficient information on the mechanics of the proposed motion. The sitting at which this is intended to be taking place is Tuesday 24<sup>th</sup> March 2026.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Crookall', with a horizontal line underneath the name.

Minister Tim Crookall (MHK)

## Local Government (Amendment) Bill

### Consideration of Legislative Council amendments

Hon Member for Glenfaba and Peel, Mr Crookall, to move –

1.1 That Standing Orders be suspended to the extent necessary to enable the motion at item 1.2 to be moved.

Hon Member for Glenfaba and Peel, Mr Crookall, to move –

1.2 That the House rescinds its order of 28th January 2025 that New Clause 1 be approved in principle and its order of 11th February 2025 that New Clause 1, as amended, stand part of the Bill;

and that in respect of –

Amendment 5 (to Clause 12), the House do agree with the Council's amendment;

Amendment 6 (to Clause 20), the House do agree with the Council's amendment;

Amendments 7, 8, 9 and 10 (to Clause 47), the House do agree with the Council's amendments; and

Amendment 11 (to Clause 50), the House do agree with the Council's amendment;

and that the Clauses of the Bill be renumbered.

#### **Explanatory note**

The effect of the motion at item 1.2 would be to remove Clause 5 from the Bill and agree the Legislative Council amendments to other Clauses. If item 1.2 were carried, the Bill would need to be again considered by the Legislative Council.

R.P.
Date: 30.03.2026

ONCHAN DISTRICT COMMISSIONERS REPLYED	
30 MAR 2026	
FAQ	
ACKNOWLEDGED	
REPLIED	

Onchan Park


30/3/2026

## Official Opening Day

Dear *Mr. A. Allen*

The Official Open Day for Lawn Bowls (Flat Green) Isle of Man will take place on Saturday May 9<sup>th</sup> 2026 at 1.30pm and we would be grateful if you were able to attend and open the green by 'rolling the first bowl'. If you are unable to attend could you please nominate your deputy or another Commissioner to attend .

Any Commissioners who would also like to attend will be most welcome and can even join in and have a try at lawn bowls.

There will be a buffet also at half time which you are welcome to stay for. Can you please confirm whether yourself or a deputy will be attending by emailing : 

Thankyou ,

  
Win Kewley

Secretary Lawn Bowls Isle of Man

**Alyson Crellin**

---

**To:** Admin  
**Subject:** FW: Letter to Alf Cannon

---

**From:** [REDACTED]  
**Sent:** 01 April 2026 17:49  
**To:** Ross Phillips <[rossphillips@onchan.org.im](mailto:rossphillips@onchan.org.im)> [REDACTED]  
**Subject:** RE: Letter to Alf Cannon

**Sent for and on behalf of the Chief Minister, Hon. Alfred Cannan MHK**

Dear Mr Phillips, [REDACTED]

Thank you very much for your correspondence of 30 May 2025 regarding the Isle of Man Government Superannuation Scheme and the request for progress on scheme reform.

I would like to convey my sincere apologies for the significant delay in responding to your correspondence, which was the result of an administrative error.

I am grateful to the Board of Onchan District Commissioners for setting out its views in support of progressing reform of the current Superannuation Scheme, and I recognise the importance of this matter for ratepayers and social housing tenants across the Island.

I can confirm that I have discussed this matter with the Department of Infrastructure, both during 2025 and again more recently. I have been advised that, due to the Island Plan priority of enabling offshore developments, the Department's limited legislative drafting resource has necessarily been primarily aligned to that area of work.

The drafting of the legislation required to support the introduction of Superannuation Scheme reform is a complex undertaking and will require a significant level of dedicated resource. The Department of Infrastructure continues to review the allocation of its legislative drafting capacity and will re-establish the policy reform work needed to take this project forward as soon as possible, in line with the commitment to replace the Local Government Superannuation Scheme within the 2025 DOI Department Plan, which was presented to Tynwald.

Kind regards,



**Alfred Cannan MHK**  
**Chief Minister**  
Oik yn Ard-Shirveishagh

Office of the Chief Minister | Cabinet Office | Isle of Man Government | 3<sup>rd</sup> Floor Government Office | Bucks Road | Douglas | Isle of Man | IM1 3PN | [Chiefminister.privateoffice@gov.im](mailto:Chiefminister.privateoffice@gov.im) | 01624 685706



R.P.

Date: 8/4/2026

ONCHAN DISTRICT  
COMMISSIONERS  
RECEIVED

- 8 APR 2026

FAO

ACKNOWLEDGED

REP



MOTION NO. 77

APPENDIX B.1.

## ONCHAN DISTRICT COMMISSIONERS

### NOTICE OF MOTION

**Proposed by:** Commissioner Scott Wilson

**To:** Chief Executive/Clerk

**Date:** 8<sup>th</sup> April 2026

**Standing Order 19.5:** Any motion of which notice has been duly given, upon being moved and seconded, shall stand deferred without discussion until the next ordinary meeting of the Authority, this being Monday 27<sup>th</sup> April 2026.

#### Motion

**That the Authority agrees to introduce a structured opportunity for members of the public attending Ordinary Board Meetings to ask questions of the Chair or relevant Commissioners, in order to enhance transparency, accessibility, and public engagement in the Authority's decision-making processes.**

#### Motion Details:

- 1) Implementation Date** – this motion is to take effect from the first Ordinary Board Meeting of the Authority following the Annual General Meeting scheduled for Tuesday 5<sup>th</sup> May 2026.
- 2) Question Period** – a dedicated question period to be introduced within the agenda, allowing a period of up to 15 minutes. This period is to be considered within the agenda after the appointment of the Chair, declarations of interest, and business required by statute to be considered before any other business.

- 3) **Scope of Questions** – members of the public to ask questions that are relevant to the business of the Authority.
- 4) **Chair's Discretion and Control** – the Chair shall retain full discretion to:
  - Determine the relevance and admissibility of questions.
  - Manage the order and duration of questions.
  - Refuse questions that are defamatory, inappropriate, or outside the remit of the Authority.
  - Require questions to be concise and directed through the Chair.
  - Intervene where contributions become disruptive; and
  - Order the removal of individuals or suspend proceedings in the event of continued disruption.
- 5) **Standing Orders** – the relevant procedural changes to be included within an updated version of the Authority's Standing Orders, specifically in relation to Standing Orders 17 (Order of Business) and 43 (Attendance of the Public and Press).
- 6) **Minutes** – questions raised and considered by members of the public in an Ordinary Board Meeting are to be recorded in the minutes; however, those raising the questions will not be named within the minutes.
- 7) **Trial Period** – the introduction of the public question period shall operate on a trial basis for a period of three months from the date of resolution.
- 8) **Review Mechanism** – at the conclusion of the trial period, the Authority shall formally review the effectiveness, impact, and operational implications of the arrangement.
- 9) **Reversion Provision** – should substantive concerns arise, the Authority may, by way of a further Motion, amend or discontinue the arrangement.

#### Supporting Information

At present, members of the public attending Ordinary Board Meetings are permitted to observe proceedings but are not afforded any structured opportunity to participate. This creates a clear limitation in terms of accessibility and public engagement.

Notably, Braddan Parish Commissioners have already implemented a model that allows for public participation within their Ordinary Board Meetings. Their Standing Orders provide for a defined question period, subject to time limits, Chair control, and

procedural safeguards. This demonstrates that such an approach is both workable and capable of being managed effectively within a formal meeting structure.

In contrast, Ramsey Town Commissioners have introduced separate public accountability meetings. While this represents a step towards engagement, it is notably detached from the Authority's formal decision making processes, and does not allow for questions to be raised in the context of live agenda items.

A similar proposal was previously considered by the Authority under Motion 68 in 2023, which was not supported at that time. However, expectations of openness and engagement in public administration continue to evolve, and it is increasingly difficult to justify a position where members of the public may observe decisions being made, but are not permitted to ask questions in a structured and controlled manner.

It is disappointing that such a basic mechanism for public engagement is not already embedded within the Authority's procedures.

This Motion does not propose an unrestricted or unmanaged approach. It introduces clear safeguards, including time limits and the Chair's discretion, ensuring that meetings remain orderly and focused.

Furthermore, by adopting a defined trial period, the Authority retains full control over whether the arrangement should be continued, amended, or withdrawn, based on practical experience rather than assumption.

This represents a proportionate and responsible step towards improving transparency and strengthening public confidence in the Authority's governance.

**This Notice of Motion, dated 9<sup>th</sup> April 2026, signed by:**

Name SCOTT WILSON.....

Signed [Signature].....

ONCHAN DISTRICT COMMISSIONERS RECEIVED	
- 8 APR 2026	
FAO	
ACKNOWLEDGED	
REPLIED	



## ONCHAN DISTRICT COMMISSIONERS

### NOTICE OF MOTION

**Proposed by:** Commissioner Scott Wilson

**To:** Chief Executive/Clerk

**Date:** 8<sup>th</sup> April 2026

**Standing Order 19.5:** Any motion of which notice has been duly given, upon being moved and seconded, shall stand deferred without discussion until the next ordinary meeting of the Authority, this being Monday 27<sup>th</sup> April 2026.

#### Motion

That the Authority agrees to amend its current approach to the recording of Board Meeting Minutes, as established by Motion 69 (March 2024), in order to enhance transparency, accountability, and clarity in its decision-making processes.

That this Motion shall replace the resolution adopted under Motion 69 and introduce the recording of individual Board Member names when relevant within the Minutes of Board Meetings, rather than being limited only to recording attendances at meetings and events, declarations of interest, whom questions submitted under Standing Orders have been submitted by, proposers and seconders of motions, and voting in relation to resolutions set by the Board.

**Motion Details:**

- 1) **Implementation Date** – this motion is to take effect from the first Ordinary Board Meeting of the Authority following the Annual General Meeting scheduled for Tuesday 5<sup>th</sup> May 2026.
- 2) **Scope of Recording** – include the recording of Board Member names in relation to:
  - Contributions made during the discussion where these materially inform the decision.
  - Attendances at meetings and events.
  - Declarations of interest.
  - Whom questions submitted under Standing Orders have been submitted by.
  - Proposers and seconders of motions; and
  - Voting in relation to resolutions set by the Board.
- 3) **Trial Period** – the introduction of the public question period shall operate on a trial basis for a period of three months from the date of resolution.
- 4) **Review Mechanism** – at the conclusion of the trial period, the Authority shall formally review the effectiveness, impact, and operational implications of the arrangement.
- 5) **Reversion Provision** – should substantive concerns arise, the Authority may, by way of a further Motion, amend or discontinue the arrangement.

**Supporting Information**

The current approach to recording Minutes, including the exclusion of Board Member names from general discussion, arises from a resolution of the Authority under Motion 69 (March 2024), rather than from any statutory or legal requirement.

Guidance previously issued to Board Members confirms that there is no prescribed statutory definition or format for Minutes, and that local authorities may adopt different approaches depending on their governance preferences.

Guidance has been obtained from the Chief Executive/Clerk in relation to professional guidance, such as Knowles on Local Authority Meetings (a Manual of Law and Practice), the Association of Democratic Service Officers, and the Department of Infrastructure Local Authority Handbook, which support the Authority's

right to retain full discretion to determine the level of detail and transparency within its official record.

The Authority's current format is described as a compromise between a narrative record and a resolution-based record, with the explicit position that contributions are summarised, but not attributed to individual Board Members. However, the same guidance confirms that Board Member names are already recorded in specific circumstances, including attendance, voting, and procedural matters. This demonstrates that the exclusion of names from broader discussion is not a legal necessity, but a discretionary limitation introduced through local resolution.

It is therefore difficult to justify the continued restriction on recording Board Member contributions, particularly in the context of modern expectations of openness in public administration. The absence of named contributions can limit the clarity of the public record and reduce accountability, particularly where decisions are of significance to residents and stakeholders.

This Motion adopts a measured and proportionate approach. It does not impose an immediate permanent change, but instead introduces a defined trial period, allowing the Authority to assess the practical implications before determining whether to adopt the approach on a longer-term basis.

In doing so, it provides an opportunity to align the Authority's practices with broader standards of transparency, while retaining appropriate safeguards and flexibility.

**This Notice of Motion, dated 9<sup>th</sup> April 2026, signed by:**

Name SCOTT WILSON .....

Signed  .....



## REPORT

<b>Report to:</b>	Board of Onchan District Commissioners
<b>Reporting Officer:</b>	Housing Manager
<b>Date of the Meeting:</b>	13 <sup>th</sup> April 2026
<b>Subject:</b>	Amendment to public sector general needs housing income thresholds - Public Consultation
<b>Public or Private Document:</b>	Public

### **Introduction:**

The Housing Agency in the Department of Infrastructure has launched a public consultation regarding proposed amendments to the Public Sector General Needs Housing Income Thresholds.

The key proposals include:

- Updating income eligibility thresholds and introducing automatic annual uplifts
- Removing certain 'priority' points that do not reflect housing need
- Introducing discretion for local housing authorities on residential requirements

The closing date for responses is 19<sup>th</sup> May 2026. DOI have indicated that no extensions to the deadline will be granted.

### **Previously Considered by the Board:**

Not applicable.

### **Recommendation/s or Action/s Taken:**

That responses be drafted and considered at the next meeting of the Board to be held on 27<sup>th</sup> April 2026.

### **Supporting Rationale:**

The public consultation has been developed to give people who are affected by these policies an opportunity to share their views and influence the policy. This will help ensure proposed changes are fair and practical. The feedback gathered will help shape the policy before the proposed changes are agreed through Tynwald. The consultation documents are attached.

### **Alternatives Considered but not Recommended:**

That the Board does not submit a consultation response.

<b>Standing Orders:</b>
Not applicable.
<b>Resource Impact:</b>
<ul style="list-style-type: none"> <li>• Officer time – reviewing housing applications to ensure income eligibility under the proposed new policy is applied consistently and fairly.</li> <li>• Officer time – reviewing fixed term tenancies, particularly where rents have already been uplifted to reflect the revised income criteria.</li> </ul>
<b>Financial Impact:</b>
<ul style="list-style-type: none"> <li>• The proposals may lead to a reduction in rents where for some households have had the uplifted rent applied. We would expect this to only have a minimal impact on rents receivable.</li> </ul>
<b>Legal and/or Insurance Impact:</b>
Not applicable.
<b>Equality Impact:</b>
Not applicable.
<b>Climate Change Impact:</b>
Not applicable.
<b>Consultation with Others:</b>
<ul style="list-style-type: none"> <li>• Chief Executive/Clerk</li> <li>• Housing Manager</li> <li>• Housing Officer</li> </ul>
<b>General Data Protection Regulations and/or Confidentiality Impact:</b>
Not applicable.
<b>Appendices:</b>
See attached consultation documents.

**For Members Consideration.**



**A.S. GALE (Mrs)**

**HOUSING MANAGER**

# Amendments to public sector general needs housing income thresholds

## Overview

The Public Sector Housing (General Needs) (Allocation) Policy 2019 is currently undergoing a full review. Because this review is extensive, the Housing Agency (on behalf of the Department of Infrastructure) is proposing to introduce several essential changes ahead of the full update.

These early amendments focus on improving fairness, clarity, and consistency in how public sector housing is allocated. We are seeking your views on three key proposed changes:

1. **Updating income eligibility thresholds and introducing automatic annual uplifts**
2. **Removing certain 'priority' points that do not reflect housing need**
3. **Introducing discretion for local housing authorities on residential requirements**

## Why your views matter

Your feedback plays a vital role in shaping how public sector housing is allocated. The proposed changes aim to make the system fairer, clearer, and more responsive—but it is essential that the people who use, rely on, or are affected by the policy have the opportunity to influence it.

By sharing your views, you help us to:

- **Understand real-life experiences** of those navigating the housing system
- **Identify unintended impacts** that may not be visible from data alone
- **Test whether the proposed changes feel fair and workable** for households and communities
- **Ensure the policy reflects local needs and values**, not just administrative requirements
- **Strengthen transparency and accountability** in how decisions are made

Public sector housing policy affects thousands of people. Your insight helps ensure that the system is not only technically sound but also grounded in the lived realities of the community it serves.

Your views will assist the Department in finalising the draft amendments to the existing Allocations Policy ahead of being taken to Tynwald for formal approval.

## Reasonable adjustments and alternative formats

The Department is committed to equal opportunities and our aim is to make our documents easy to use and accessible to all.

The Department will take steps to accommodate any reasonable adjustments and provide such assistance as may reasonably be required to enable access or reply to this consultation.

If this document is required in another format or assistance is required with accessing or replying to this consultation, please email [Lisa.philliskirk@gov.im](mailto:Lisa.philliskirk@gov.im)

## Responding to this consultation and questions

This consultation can be responded to by clicking on the 'Online survey' link below.

Alternatively you can download a paper version of this consultation from the 'Related' section below and email it to [Lisa.philliskirk@gov.im](mailto:Lisa.philliskirk@gov.im) or post it to:

Lisa Philliskirk  
Head of Housing  
2nd Floor Markwell House,  
Market St,  
Douglas,  
IM1 2RJ

## What happens next

The feedback from this consultation will be reviewed by the Housing Agency Board and will give direction to any final changes to be made to the general needs public sector housing allocation policy. It is anticipated that the amendments will be brought to Tynwald for approval in July 2026.

## About you

### 1 What is your name?

Name

2 What is your email address?

Email

3 The Department will share the consultation response report. May we publish your response?

**More information**

- Publish in full – your name along with full answers **may** be published on the hub or on the report (your email will **not** be published)
- Publish anonymously – only your responses **may** be published on the hub or on the report (your name and email will **not** be published)
- Do not publish – **nothing will** be published publicly on the hub or on the report (your response will only be part of a larger summary response document)

*(Required)*

*Please select only one item*

- Yes, you can publish my response in full
- Yes, you may publish my response anonymously
- No, please do not publish my response

## Proposed change 1: Updating income eligibility thresholds and introducing automatic annual uplifts

### Increase income thresholds

Income thresholds determine whether a household can join the general needs public sector housing waiting list. These thresholds have not been updated since 2023 and no longer reflect current economic pressures or the rising cost of living.

The Housing Agency has reviewed existing data and proposes to **increase income thresholds to reflect today's economic conditions**.

#### Current income thresholds (maximum gross annual income)

- **Single applicants with:**
  - no dependent children: **£34,500**
  - 1 child: **£40,000**
  - 2 children: **£43,500**
  - 3 children or more: **£47,000**
  
- **Joint applicants with:**
  - no dependent children: **£38,000**
  - 1 child: **£43,500**
  - 2 children: **£47,000**
  - 3 children or more: **£50,500**

#### Proposed income thresholds (maximum gross annual income)

- **Single applicants with:**
  - no dependent children: **£35,800**
  - 1 child: **£43,000**
  - 2 children: **£47,800**
  - 3 children or more: **£50,200**
  
- **Joint applicants with:**
  - no dependent children: **£50,200**
  - 1 child: **£56,700**
  - 2 children: **£59,800**
  - 3 children or more: **£63,900**

### Automatic annual adjustments

The Housing Agency has reviewed existing data and proposes to **introduce automatic annual adjustments in line with the Consumer Price Index (CPI)**.

From 1 April 2027, the figures shall increase annually on 1 April by a percentage equal to the percentage increase in the Consumer Price Index published by the Cabinet Office for the preceding September, rounded up to the nearest whole pound.

Linking thresholds to CPI would create a clearer, more predictable system. Applicants would better understand how thresholds may change each year, and the policy would remain up to date without requiring frequent manual amendments. This approach helps ensure that eligibility criteria keep pace with inflation and do not erode over time.

#### 4 Do you agree with the proposed income threshold increases?

*Please select only one item*

- Yes, I agree
- No, I disagree

Any further comments?

### 5 Do you agree with the proposed automatic annual uplift of thresholds?

Please select only one item

- Yes, I agree
- No, I disagree

Any further comments?

### Proposed change 2: Removing certain 'priority' points that do not reflect housing need

As part of the review, the Housing Agency has assessed whether current priority criteria genuinely relate to housing need. Some criteria have been found to be outdated or too broad, and therefore no longer appropriate.

The proposal is to remove additional priority currently given for:

- Income level alone
- Living in a private sector tenancy

And to remove the reduction of priority for households with:

- Financial assets above £15,000

#### Why remove these criteria

To ensure that priority is only given where circumstances worsen a household's housing need, priority will no longer be awarded for the following:

##### 1. Having a low income:

A low income doesn't always mean someone is living in poor housing. For example, a person on a lower income might be living in a safe, suitable home, while someone with a higher income could be living in overcrowded or unsuitable conditions. **Housing conditions — not income — should be the main factor**

##### 2. Living in a private tenancy:

Not all private rentals are the same. Someone might be renting a good-quality home at a reasonable cost, while another household may be living with family or friends in cramped or unsuitable conditions. Again, **the focus should be on actual living conditions**, not the type of tenancy

Priority will **not** be reduced for:

##### 3. Having financial assets or property:

Current policy removes priority if a household has property or assets worth £15,000 or more. But this can be unfair — for example, owning a car worth £15,000 doesn't mean someone can sell it to secure long-term housing. What matters most is whether their **current living situation** is safe and suitable. There are already rules in place to make sure that people who can afford to secure their own housing cannot join the public sector housing list. This safeguard remains unchanged.

Removing these criteria ensures that priority is based on actual housing need rather than broad assumptions.

### 6 Do you agree that the pointing schedule should be based upon housing need only?

Please select only one item

- Yes, I agree
- No, I disagree

Any further comments?

### Proposed change 3: Introducing discretion for local housing authorities on residential requirements

The Housing Agency proposes to extend discretion to local housing authorities in relation to certain residency requirements. This would bring the policy in line with the Housing (Miscellaneous Provisions) Act 1976 and ensure authorities can exercise their discretion appropriately.

This discretion is particularly important in safeguarding situations.

#### 3-month immediate residency requirement

At the moment, anyone who wants to join the public sector housing waiting list must have lived on the Isle of Man for three months immediately before applying. For most people this is straightforward — but for others, it creates real difficulties.

*For example, a disabled person may need suitable accommodation before they can safely return to the island. But under the current rule, they cannot join the waiting list until they have already been living here for three months.*

This means some of the people who need help the most are unable to even get onto the list.

The amendments propose to let someone join the waiting list without waiting the full three months if the housing authority believes the circumstances justify it.

This flexibility is especially important for people who are vulnerable, at risk, or unable to secure suitable accommodation without support.

#### 10-year residency requirement

Anyone currently applying for public sector housing must have lived on the Isle of Man for a total of at least 10 years.

While this rule works in many cases, it can create real challenges when a household is facing serious risk or urgent housing need. In situations where someone's safety, health, or wellbeing is at stake, waiting until they meet the full 10-year requirement may not be realistic or fair.

*For example, a person has been living on the island for 8 years and is experiencing a relationship breakdown. They have children here at school who are part of a wider extended family. They require accommodation to ensure they do not need to leave the island.*

The proposed change would allow local housing authorities to reduce the 10-year residency requirement when there is a good reason to do so. This gives authorities the ability to respond to exceptional or urgent situations where strict rules would otherwise prevent someone from getting the help they need.

#### 3-year within a local authority residency requirement

At present, applicants must have lived within a specific local housing authority area for at least three years before they can be allocated public sector housing in that area.

While this rule helps prioritise long-term local residents, it can also create difficulties in cases where a household has a genuine and urgent housing need but has not yet met the full three-year requirement.

*For example, a person fleeing domestic abuse who cannot reasonably meet the standard 3-year immediate residency requirement before applying to another local authority to leave the vicinity of a perpetrator.*

The proposed change would give local housing authorities the power to reduce the three-year local residency requirement when there is a good reason to do so.

These changes do **not** widen access to public sector housing. Instead, they ensure that local authorities can respond appropriately to welfare and safeguarding needs without being constrained by rigid rules.

**7** Do you have any comments regarding the proposed policy change to incorporate discretion relating to any of the residential periods (3 months, 3 years, or 10 years)?

# C

## PUBLIC SECTOR HOUSING (GENERAL NEEDS) (ALLOCATION) (AMENDMENT) POLICY 2026

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Statutory Document No. 20XX/XXXX

# C

*Housing (Miscellaneous Provisions) Act 1976*

## **PUBLIC SECTOR HOUSING (GENERAL NEEDS) (ALLOCATION) (AMENDMENT) POLICY 2026**

*Approved by Tynwald:*

*Coming into operation in accordance with paragraph 2*

---

The Department of Infrastructure, having consulted all the local authorities that would be affected by it<sup>1</sup>, adopts the following Policy under paragraph 1A(1)<sup>2</sup> of Schedule 3 to the Housing (Miscellaneous Provisions) Act 1976.

### **1 Title**

This Policy is the Public Sector Housing (General Needs) (Allocation) (Amendment) Policy 2026.

### **2 Commencement**

If approved by Tynwald, this Policy comes into operation on [TBC]<sup>3</sup>.

### **3 Amendment of the Public Sector Housing (General Needs) (Allocation) Policy 2019**

The Public Sector Housing (General Needs) (Allocation) Policy 2019<sup>4</sup> is amended as follows.

### **4 Paragraph 3A inserted**

After paragraph 3 (interpretation), insert —

---

<sup>1</sup> As required by paragraph 1A(2) of Schedule 3 to the Act.

<sup>2</sup> Paragraph 1A was inserted by Schedule 3 to the Housing (Miscellaneous Provisions) Act 2011.

<sup>3</sup> Under paragraph 1A(3) of Schedule 3 to the Act, this Policy shall not come into operation until it is approved by Tynwald.

<sup>4</sup> SD 2019/0075.

«3A **Automatic uplift**

From 1 April 2027, the figures in the table in paragraph 3(1) of the schedule shall increase annually on 1 April by a percentage equal to the percentage increase in the Consumer Price Index published by the Cabinet Office for the preceding September, rounded up to the nearest whole pound.».

**5 Paragraph 4 amended**

- (1) Paragraph 4 (allocation of general needs public sector housing) is amended as follows.
- (2) In subparagraph (3), after “date of allocation.”, on a separate line, insert —  
| «This is subject to sub-paragraph (3A).».
- (3) After subparagraph (3), insert —  
| «(3A) The relevant housing authority may, where it is satisfied with any reasons which appear to the relevant housing authority to be sufficient, reduce the period of 3 months mentioned in subparagraph (3).».

**6 Schedule amended**

- (1) The Schedule (allocation of general needs public sector housing) is amended as follows.
- (2) In Part 1 (conditions for inclusion on a housing waiting list for general needs public sector housing) —
  - (a) in paragraph 2 (residential conditions) —
    - (i) in subparagraph (1), for “sub-paragraph (3)” substitute «sub-paragraphs (3) and (4)»; and
    - (ii) in subparagraph (2), for “sub-paragraph (3)” substitute «sub-paragraphs (3) and (5)»; and
    - (iii) after subparagraph (3) insert —  
| «(4) The relevant housing authority may, where it is satisfied with any reasons which appear to the relevant housing authority to be sufficient, reduce the period of 10 years mentioned in subparagraph (1).
  - (5) The relevant housing authority may, where it is satisfied with any reasons which appear to the relevant housing authority to be sufficient, reduce the period of 3 years mentioned in subparagraph (2).»; and
- (b) in paragraph 3 (financial conditions) —
  - (i) for the table in subparagraph (1), substitute —  
| «

Household composition	Maximum income threshold	Household composition	Maximum income threshold
Single, no children	£35,800	Couple, no children	£50,200
Single, 1 child	£43,000	Couple, 1 child	£56,700
Single, 2 children	£47,800	Couple, 2 children	£59,800
Single, 3 children	£50,200	Couple, 3 children	£63,900

»;

- (ii) in subparagraph (2) —
  - (aa) after “assets”, insert «(including any interest accrued in respect of the applicant’s or joint applicants’ savings)»; and
  - (bb) after “£30,000.”, insert on a separate line —  
 «This is subject to sub-paragraph (4).»;
- (iii) omit subparagraph (3).

- (3) In Part 2 (points system for general needs public sector housing), in paragraph 2, in the table, omit —
  - (a) criterion 5 (gross annual income);
  - (b) criterion 9 (private sector tenant); and
  - (c) criterion 10 (financial property/assets).

**MADE**

**TIM CROOKALL**  
*Minister for Infrastructure*

*EXPLANATORY NOTE*

*(This note is not part of the Policy)*

This Policy makes a number of amendments to the Public Sector Housing (General Needs) Policy 2019 (as amended) [SD 2019/0075].

Paragraph 4 introduces an automatic uplift to the thresholds in line with inflation.

Paragraph 5 clarifies that the housing authority may exercise discretion to reduce the requirement to be resident on the Isle of Man for at least three months.

Paragraph 6 amends the conditions and criteria used to assess an applicant's place on the waiting list for general needs public sector housing.



## PUBLIC SECTOR HOUSING (GENERAL NEEDS) (ALLOCATION) POLICY 2019

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Statutory Document No. 2019/0075

*Housing (Miscellaneous Provisions) Act 1976*

## **PUBLIC SECTOR HOUSING (GENERAL NEEDS) (ALLOCATION) POLICY 2019<sup>1</sup>**

*Approved by Tynwald:* 20 March 2019  
*Coming into operation:* 1 June 2019

The Department of Infrastructure, having consulted all the local authorities that would be affected by it<sup>1</sup>, adopts the following Policy under paragraph 1A(1)<sup>2</sup> of Schedule 3 to the Housing (Miscellaneous Provisions) Act 1976.

### **1 Title**

This Policy is the Public Sector Housing (General Needs) (Allocation) Policy 2019.

### **2 Commencement**

If approved by Tynwald, this Policy comes into operation on 1 June 2019<sup>3</sup>.

### **3 Interpretation and extent**

(1) In this Policy, unless the context otherwise requires, —

“**the Act**” means the Housing (Miscellaneous Provisions) Act 1976;

“**applicant**” means a person who has made an application for housing and, includes a single applicant and either (or both) joint applicants;

“**application for housing**” means an application made to a housing authority to be selected for public sector housing;

“**couple**” means, —

- (a) two people who are married to, or civil partners of, each other; or
- (b) two people who are not married to, or civil partners of, each other but are living together, or have indicated on an application for housing they intend to live together, as a married couple or as civil partners;

<sup>1</sup> As required by paragraph 1A(2) of Schedule 3 to the Act.

<sup>2</sup> Paragraph 1A was inserted by Schedule 3 to the Housing (Miscellaneous Provisions) Act 2011.

<sup>3</sup> Under paragraph 1A(3) of Schedule 3 to the Act, this Policy shall not come into operation until it is approved by Tynwald.

**“dependent child”** means a child or young person, —

- (a) aged under 18; or
- (b) aged between 18 and 21, and receiving full-time education, whether in the Island or elsewhere,

and an applicant **“has a dependent child”** if that dependent child’s place of ordinary residence (disregarding any period during which the dependent child is receiving full-time education outside the Island) is with the applicant;

**“general needs public sector housing”** has the meaning given by paragraph 4;

**“housing authority”** means, —

- (a) the Department; or
- (b) a local authority;

**“housing authority area”** means, —

- (a) in relation to the Department, any area within the boundaries of the district of any local authority in which is situated housing owned by the Department;
- (b) in relation to a local authority, any area within the boundaries of the district of that local authority; or
- (c) in relation to a shared waiting list, the combined area within the boundaries of each of the housing authorities using that list;

a housing authority’s **“housing waiting list”** means the waiting list maintained by that authority for the purpose of allocating housing by that authority in accordance with this Policy and includes any shared waiting list;

**“joint applicant”** means a person who, with another, has made an application for housing;

**“notice to quit”, “property”, “rent” and “tenant”** have the meanings given in section 3 of the Landlord and Tenant Act 1954 and related phrases are to be construed in accordance with that Act;

**“private sector housing”** means housing which is not public sector housing;

**“public sector housing”** means housing provided by a housing authority under the Act or Part IV of the Housing Act 1955;

**“relevant housing authority”** means the housing authority to whom an application for housing has been made;

**“shared waiting list”** means an agreement between two or more housing authorities, which may include the Department, that their housing waiting list is to be shared by each of the authorities in that agreement;

**“sheltered housing”** has the meaning given by paragraph 4 of the Public Sector Housing (Older Persons) (Allocation) Policy 2019<sup>4</sup>;

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<sup>4</sup> See SD 2019/0074

“**single person**” means a person who is not a member of a couple; and

“**unjustified refusal**” means a refusal by an applicant, without a valid reason, of an offer of housing made by a housing authority which that authority considers suitable for the applicant.

- (2) This Policy applies only to any initial allocation of general needs public sector housing.

#### 4 Allocation of general needs public sector housing

- (1) An applicant may be selected by a housing authority for general needs public sector housing which is not sheltered housing (“**general needs public sector housing**”) provided by that authority if, —
- (a) the applicant is, or has been, accepted for inclusion on that authority’s housing waiting list; and
- (b) the applicant has the highest number of points among those other persons on the housing waiting list for that type of housing, subject to the housing being suitable for the applicant’s specific housing needs.

The number of points which an applicant has for the purpose of sub-paragraph (b) is the sum of the points obtained in accordance with Part 2 of the Schedule in the applicant’s case.

This sub-paragraph is subject to sub-paragraphs (2) to (4).

- (2) An applicant may be accepted for inclusion on a housing authority’s housing waiting list only if the applicant meets all of the conditions which apply in the applicant’s case specified in Part 1 of the Schedule.
- (3) An applicant shall not be selected by a housing authority for allocation of general needs public sector housing, unless, —
- (a) the applicant has; or
- (b) in the case of joint applicant’s either or both applicants have, been ordinarily resident in the Island for at least 3 months immediately prior to the date of allocation.
- (4) An applicant shall not be selected by a housing authority for allocation of general needs public sector housing if the applicant or either of the joint applicants owns residential accommodation in any jurisdiction.

This is subject to sub-paragraph (5).

- (5) If the applicant, or either of the joint applicants, owns residential accommodation (“**the premises**”) in any jurisdiction, the applicant may nevertheless be accepted for inclusion on the relevant housing authority’s housing waiting list for general needs public sector housing providing all of the following conditions are satisfied prior to allocation, —

*Condition 1*

In the opinion of the relevant housing authority, the premises are unsuitable for occupation by the applicant.

*Condition 2*

The applicant can provide evidence the premises are being actively marketed with a view to their disposal.

*Condition 3*

Disposal of the premises is anticipated within six months of allocation of general needs public sector housing.

This condition is subject to sub-paragraph (6).

*Condition 4*

The following are provided by the applicant, —

- (a) an estate agents' current valuation of the premises; and
- (b) details of any financial charges currently held against the premises by third parties; and
- (c) any other documents or information requested by the relevant housing authority.

*Condition 5*

The sum of any savings or assets available to the applicant, along with the residual value of the premises, after the deduction of, —

- (a) any financial charges held against the premises by third parties; and
- (b) any reasonable fees incurred in, or in connection with, the disposal of the premises,

will not exceed the financial condition specified in paragraph 3(2) of Part 1 of the Schedule.

- (6) If the premises have not been disposed of within the period specified in condition 3 of sub-paragraph (5) the applicant may nevertheless be considered to meet that condition if, in the opinion of the relevant housing authority, the applicant is continuing to actively market the premises at a price which reasonably reflects the prevailing market value.

## 5 Review of decisions made by the Department

- (1) This paragraph applies to any decision ("the relevant decision") made by the Department as to —
  - (a) whether or not an applicant is to be accepted for inclusion on the Department's housing waiting list;
  - (b) the number of points which an applicant has in accordance with Part 2 of the Schedule; or
  - (c) whether or not an applicant is selected for allocation of a property.

- (2) If the applicant is dissatisfied with the relevant decision, the applicant may request that the Department review its decision.
- (3) A request for a review must —
  - (a) state the grounds on which the review is requested; and
  - (b) be made in writing within one month of the date of notification of the relevant decision.
- (4) The Department must —
  - (a) review the relevant decision in a timely manner; and
  - (b) notify the applicant of the outcome of that review.
- (5) Any decision made by the Department following the review is final.<sup>2</sup>

## 6 Review of, and appeal against, decisions made by a local authority

- (1) This paragraph applies to any decision (“**the relevant decision**”) made by a local authority as to, —
  - (a) whether or not the applicant is to be accepted for inclusion on that local authority’s housing waiting list;
  - (b) the number of points which an applicant has in accordance with Part 2 of the Schedule; or
  - (c) whether or not an applicant is selected for allocation of a property.
- (2) If the applicant is dissatisfied with the relevant decision, the applicant may request the local authority, in writing, to review that decision.
- (3) If, on review the relevant decision is upheld, the applicant may appeal against the relevant decision, in writing, to the Department.
- (4) Any decision of the Department on such an appeal is final.

## 7 Guidance

- (1) The Department may issue guidance about the matters to be taken into account in determining (in particular)—
  - (a) how applicants with the same points on a housing waiting list may be prioritised;
  - (b) the category of housing type for eligible applicants (for example the number of bedrooms applicable to the applicant’s or joint applicants’ requirements);
  - (c) how income and capital, including notional capital and notional income, are to be treated;
  - (d) the additional relationships of persons who may apply to a housing authority and be treated as joint applicants in exceptional circumstances;

- (e) how the points may be allocated for joint applicants, where both applicants satisfy the same criterion in Part 2 of the Schedule;
  - (f) how points may be allocated for an applicant, or joint applicants, who share responsibility for a dependent child with another person;
  - (g) the circumstances in which an applicant in tied accommodation may be accepted on a housing waiting list;
  - (h) who the relevant housing authority is for the purposes of, —
    - (i) a review or appeal under paragraphs 5 or 6;
    - (ii) the residential condition in paragraph 2(2) of Part 1 of the Schedule; and
    - (iii) the points available for each year of residence in criterion 3 of Part 2 of the Schedule; and
  - (i) the periodic review of the housing waiting list and the process of removing an applicant from the housing waiting list for failing to respond to any review, and circumstances for reinstatement.
- (2) For the purposes of sub-paragraph (1)(c), where, in the opinion of the relevant housing authority, the applicant deliberately and wilfully disposed of any capital, that capital shall be treated in the same way as notional capital under the Income Support Regulations<sup>5</sup>.
- (3) The guidance may, among other things, give examples in connection with discretion which may be applied in deducting points for, —
- (a) unjustified refusal of an offer of allocation; and
  - (b) accumulated rent arrears.

MADE 15 FEBRUARY 2019

<sup>5</sup> See the Income Support (General) (Isle of Man) Regulations 2000 (SD 26/00).



**SCHEDULE**

[Paragraph 4]

**ALLOCATION OF GENERAL NEEDS PUBLIC SECTOR HOUSING****PART 1****CONDITIONS FOR INCLUSION ON A HOUSING WAITING LIST FOR  
GENERAL NEEDS PUBLIC SECTOR HOUSING****1 Eligible applicant conditions**

- (1) An applicant must be, —
  - (a) a single person who does not have a dependent child;
  - (b) a couple neither member of whom has a dependent child;
  - (c) a single person who has a dependent child;
  - (d) a couple either member of whom has a dependent child.
- (2) Despite sub-paragraph (1), in exceptional circumstances, and with the written approval of the Department, a joint application may be made by two single persons living together, or who intend to live together.
- (3) An applicant, or in the case of joint applicants' at least one of the applicants, must be at least 18 years old.

**2 Residential conditions**

- (1) In accordance with paragraph 1 of Schedule 3 to the Act, an applicant must have been ordinarily resident in the Island for a total period of not less than 10 years.  
This is subject to sub-paragraph (3).
- (2) An applicant must have been ordinarily resident in the relevant housing authority area for at least 3 years.  
This is subject to sub-paragraph (3).
- (3) In the case of joint applicants, only one of the applicants needs satisfy this paragraph.

**3 Financial conditions**

- (1) An applicant's gross annual income, or the sum of joint applicants' gross annual incomes, including any taxable benefits, must not exceed the maximum amount specified in the following table.

Table<sup>3</sup>

Number of dependent children	Maximum gross annual income	
	Single applicant	Joint applicant
None	£34,500	£38,000
1 child	£40,000	£43,500
2 children	£43,500	£47,000
3 or more children	£47,000	£50,500

This is subject to sub-paragraph (3).

- (2) An applicant's or joint applicants' savings and other assets must not exceed £30,000.
- (3) For the purposes of sub-paragraph (1), an applicant's gross annual income is, or the sum of joint applicants' gross annual incomes are, to include all interest accrued.

This is subject to sub-paragraph (4).

- (4) Where actual interest accrued is not evidenced, notional interest of 2% shall be applied to the applicant's or joint applicants' financial savings and other assets.

## PART 2

### POINTS SYSTEM FOR GENERAL NEEDS PUBLIC SECTOR HOUSING

1. Points are to be added or deducted in an applicant's or joint applicants' case in accordance with the Table below.

This is subject to paragraph 2.

2. In the case of joint applicants' where both applicants satisfy the criteria to be allocated points in the Table below, only the points available to one of the applicants (whichever is the higher amount in each criteria) may be taken into account for the purposes of the sum calculated for the purposes of paragraph 4(1)(b) (allocation of general needs public sector housing).

Table

Criteria	Points
1. Time on housing waiting list	1 point per each 3 month period, subject to a maximum of 20 points.
2. Years of residence in the Island	1 point for every year in excess of ten years the applicant is ordinarily resident, subject to a maximum of 10 points.
3. Years of residence in housing authority area	1 point for every year subject to a maximum of 10 points.

<b>4. Size of family</b>			
(a)	Each dependent child aged under 16; .		5 points
(b)	Each dependent child or young person aged between 16 and 21.		3 points
	Items (a) and (b) are subject to a maximum of three dependent children or young persons.		
(c)	Each additional dependent child or young person in excess of the three maximum		1 point
<b>5. Gross annual income<sup>4</sup></b>			
(a)	including, where applicable, combined income and taxable benefits of joint applicants;		
(b)	for the purposes of assessing income in the table below, child benefit is to be disregarded;		
	<b>Single applicant</b>	<b>Joint applicant</b>	<b>Points</b>
No dependent children	£20,500 and under	£24,000 and under	10 points
	£20,501 to £24,000	£24,001 to £27,500	8 points
	£24,001 to £27,500	£27,501 to £31,000	5 points
	£27,501 to £30,000	£31,001 to £33,501	2 points
	£30,001 and over	£33,501 and over	0 points
	<b>Single applicant</b>	<b>Joint applicant</b>	<b>Points</b>
With dependent children	£23,500 and under	£27,000 and under	10 points
	£23,501 to £28,500	£27,001 to £32,000	8 points
	£28,501 to £33,500	£32,001 to £37,000	5 points
	£33,501 to £38,500	£37,001 to £42,000	2 points
	£38,501 and over	£42,001 and over	0 points
(c)	in this criterion, "child benefit" means a benefit under Part 9 of the Social Security Contributions and Benefits Act 1992 <sup>6</sup> (of Parliament), as it has effect in the Island <sup>7</sup> .		
<b>6. Adequacy of present accommodation</b>			
(a)	Property condition/overcrowding (following assessment by an environmental health officer of the Department of Environment, Food and Agriculture )		
	Low priority		5 points
	Medium priority		10 points
	High priority		20 points
(b)	Health/welfare issues (validated by report from health/welfare professional & multidisciplinary assessment by health/welfare panel)		
	Low priority		5 or 10 points
	Medium priority		15 or 20 points
	High priority		25 or 30 points
<b>7. Notice to quit</b>	Court order for possession		25 points
	(excluding for rent arrears)		

<sup>6</sup> 1992 c.4<sup>7</sup> See SD 505/94

8.	<b>Manx Housing Trust Limited<sup>8</sup></b>	Accommodated in premises allocated by Manx Housing Trust Limited for 1 year or more (either at the time of application or during any period whilst on the housing waiting list)	10 points
9.	<b>Private sector tenant</b>	For 1 year or more (either at the time of application or during any period whilst on the housing waiting list)	5 points
10.	<b>Financial/property assets</b>	Including, where applicable, combined financial/property assets of joint applicants	
		£15,000 to £19,999	-1 point
		£20,000 to £29,999	-2 points
11.	<b>Unjustified refusal</b>	Discretionary deduction (per refusal)	-10 points
12.	<b>Accumulated rent arrears</b>	Discretionary deduction	-10 points

<sup>8</sup> Registered charity no. 400.



## ENDNOTES

### Table of Endnote References

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<sup>1</sup> The format of this legislation has been changed as provided for under section 75 of, and paragraph 2 of Schedule 1 to, the Legislation Act 2015. The changes have been approved by the Attorney General after consultation with the Clerk of Tynwald as required by section 76 of the Legislation Act 2015.

<sup>2</sup> Para 5 substituted by SD2023/0109.

<sup>3</sup> Table substituted by SD2023/0109.

<sup>4</sup> Entry substituted by SD2023/0109, as amended by Correction Notice dated 07 June 2023.



## REPORT

<b>Report to:</b>	Board of Onchan District Commissioners
<b>Reporting Officer:</b>	Chief Executive/Clerk
<b>Date of the Meeting:</b>	13 <sup>th</sup> April 2026
<b>Subject:</b>	Social Housing – Draft Hoarding and Self-Neglect Policy and Procedures 2026
<b>Public or Private Document:</b>	Public

### **Introduction:**

The Authority and its representatives may come into contact with those who may need further support or be at risk. The draft Policy aims to provide awareness and guidance regarding hoarding and self-neglect.

### **Previously Considered by the Board:**

Not applicable.

### **Recommendation/s or Action/s Taken:**

#### **Option 1**

That the Board resolves to approve and adopt the Hoarding and Self-Neglect Policy and Procedures.

#### **Option 2**

That the Board proposes recommended changes to the Hoarding and Self-Neglect Policy and Procedures, and that the matter be brought back before the Board for further consideration.

### **Supporting Rationale:**

The Policy provides a clear framework for staff to identify, report, and respond to hoarding and self-neglect concerns. It demonstrates the Authority's commitment to a safe and supporting environment and ensures consistent, early intervention that protects tenant wellbeing, reduces risks to property and staff, and meets safeguarding responsibilities.

### **Alternatives Considered but not Recommended:**

**Option 3**

That the Board resolves not to adopt a hoarding and self-neglect policy and procedures.

**Standing Orders:**

Schedule B(8) – Introduction of policies and procedures relevant to the provisions of services and functions undertaken by the Authority in relation to public sector housing, and any amendments which may be required.

**Resource Impact:**

Not applicable.

**Financial Impact:**

Not applicable.

**Legal and/or Insurance Impact:**

The policy has been developed considering the Safeguarding Act 2018, IOM Multi-Agency Safeguarding Procedures, Mental Health Act 1998, Capacity Act 2023, General Data Protection Regulations, and the Authority's Privacy Policy 2022.

**Equality Impact:**

The Policy aims to ensure that individuals are protected from harm and treated with dignity and respect.

**Climate Change Impact:**

Not applicable.

**Consultation with Others:**

Onchan District Commissioners:

- Deputy Clerk.
- Vice Chairman and Lead Member for Housing.
- Housing Manager.
- Housing Officer.

**General Data Protection Regulations and/or Confidentiality Impact:**

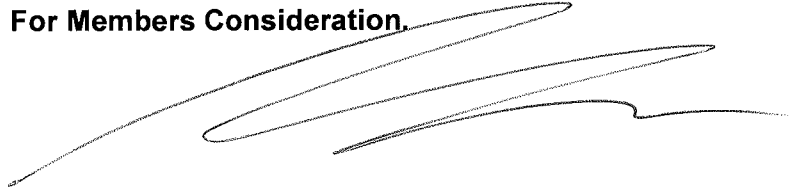
Not applicable.

**Appendices:**

See enclosed:

- Draft Hoarding and Self-Neglect Policy and Procedures 2026.

**For Members Consideration.**

A handwritten signature in black ink, consisting of several overlapping, sweeping strokes that form a cursive name.

**ROSS PHILLIPS  
CHIEF EXECUTIVE/CLERK**



**ONCHAN  
DISTRICT  
COMMISSIONERS**

Policy July 2017  
Updated November 2025  
Re-read and amended  
March 2026  
To Deputy Clerk 26/03/26  
To Lead Member 27/03/26

# Hoarding and Self-Neglect Policy and Procedures

## Housing

Date: March 2026  
Review: March 2029

**ONCHAN DISTRICT COMMISSIONERS  
SOCIAL HOUSING  
HOARDING AND SELF NEGLECT  
POLICY AND PROCEDURES**



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Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

<b>Effective from:</b>	<b>Replaces:</b>	<b>Originator:</b>	<b>Page X of Y</b>
March 2029	New Policy	Chief Executive/Clerk	1 of 10
<b>Board Ratification:</b>			

<b>History or Most Recent Policy Changes – MUST BE COMPLETED</b>		
<b>Version:</b>	<b>Date:</b>	<b>Change:</b>
1	27/03/26	New Document

## Onchan District Commissioners Hoarding and Self-Neglect Policy

### 1. Purpose

Onchan District Commissioners (the "Authority"), will come in to contact with people who may be at risk and need extra support to stay safe and well.

The purpose of this policy is to provide a framework for identifying, managing and supporting tenants who may be experiencing hoarding behaviours or self-neglect.

This policy supports the IOM Safeguarding Boards' Self Neglect Procedural Guidance Document [self-neglect-procedural-guidance.pdf](#)

### 2. Scope

This policy applies to all tenants living in properties managed by the Authority.

The policy defines:

1. The Authority's aims
2. What key words mean
3. Roles and responsibilities
4. How to report concerns
5. Training Requirements
6. How the Authority stores and keeps information private
7. Where to get more help
8. Which laws apply

### 3. Aims

- To promote tenant wellbeing and independence while balancing safety and housing standards.
- Provide early intervention and consistent responses to hoarding and self-neglect concerns.
- Help people make informed choices about their own safety, in line with Making Safeguarding Personal (see section 4.5).
- To work with the appropriate agencies to ensure tenants receive the support they need.
- Reduce risks such as fire hazards, infestations, structural damage and social isolation.

### 4. DEFINITIONS

#### 4.1 Self-Neglect:

A person's inability or unwillingness to care for themselves, their home, or their environment, leading to risks to health, safety or wellbeing.

#### 4.2 Hoarding:

Finding it hard to throw things away, regardless of value, resulting in clutter that disrupts living spaces and creates hazards. A more detailed definition is attached at Appendix 2.

#### 4.3 Adults at Risk:

Individuals who may be at risk of harm, abuse, neglect, and exploitation, due to factors such as age, disability, mental health issues, social isolation or other personal circumstances.

#### **4.4 Safeguarding Concern:**

Any situation where a tenant's health, safety, or wellbeing is at risk due to self-neglect or hoarding.

#### **4.5 Making Safeguarding Personal:**

Making Safeguarding Personal means putting the person first, focusing on what matters to them and improving their quality of life, choice and control. The six principles of safeguarding are:

1. **Empowerment** – An individual being supported and encouraged to make their own decisions and informed consent.
2. **Prevention** – It is better to take action before harm occurs.
3. **Proportionality** – The least intrusive response appropriate to the risk presented.
4. **Protection** – Support and representation for those in greatest need.
5. **Partnership** – Communities have a role to play in preventing, detecting and reporting.
6. **Accountability** – accountability and transparency in delivering safeguarding.

### **5. ROLES and RESPONSIBILITIES**

#### **5.1 Onchan District Commissioners**

- Approve policy and ensure compliance.

#### **5.2 Chief Executive/Clerk and Deputy Clerk**

- Advise management, staff and Board Members on risks and policy implications.
- Develop, implement and review policies and procedures.
- Provide guidance and oversight on complex cases.
- Collaborate with external agencies in referrals and attend safeguarding meetings..
- Give staff clear guidance on thresholds, referrals and processes.
- Provide training for staff.

#### **5.3 Housing Team**

- Complete safeguarding training appropriate to their role.
- Follow safeguarding procedures.
- Identify concerns.
- Treat the matter with confidentiality and with respect for privacy and dignity.
- Engage tenants in supportive conversations.
- Record concerns and escalate when necessary.

#### **5.4 Maintenance and Contractors**

- Report hazards or concerns observed during property visits.
- Follow safe working practices when entering cluttered environments.

#### **5.5 Tenants**

- Maintain their home to a safe and habitable standard.
- Co-operate with the housing staff and support services when concerns are raised.

## 6. PROCEDURE

Identification of Concerns	
Concerns	Staff, contractors, or neighbours notice signs of hoarding (e.g. excessive clutter, fire hazards, poor hygiene, infestations)
Internal Reporting	Document observations factually and without judgement.
	Notify the Housing Manager.
	Check the housing management system to see if any external agencies are working with the individual.
	Safeguarding concerns must be reported immediately to the designated safeguarding lead.
Initial Engagement	
Housing Officer/Manager	Engages with tenant to discuss concerns in a supportive, non-confrontational manner.
	Contact tenant's family/support network with consent or under safeguarding concerns.
	Offers support and signpost to relevant services (e.g. health, social care, fire safety).
	Document the conversation and tenants response.
Risk Assessment	Use the clutter rating scale (Appendix 1) or the quick guide: <i>There are guidelines within the Indicators for levels of risk and actions within the Isle of Man Safeguarding Board Self-Neglect Procedural guidance.</i>
	<b>Low Risk</b> - minor clutter, tenant co-operative – monitor and support
	<b>Medium Risk</b> – Significant clutter, potential hazards, tenant reluctant – escalate to Housing Manager and Safeguarding Lead.
	<b>High Risk</b> – Severe hazards (fire, structural damage, health risks) tenant un-cooperative – immediate referral to Safeguarding and possibly emergency services.
Awareness	Place alert on Housing Management System to identify there is a potential issue.
Escalation	Concerns that indicate significant risk should be referred to safeguarding.
	<b>Medium Risk:</b> Housing Manager to review case, referral to external agencies where required.
	<b>Significant/High Risk:</b> <ul style="list-style-type: none"> <li>• Referral to the Safeguarding Board and relevant agencies.</li> <li>• Home safety visit by the Fire and Rescue Service.</li> <li>• Convene multi-agency case conference.</li> <li>• Tenancy enforcement only as a last resort, after all support options explored.</li> </ul>
External Agencies	Work with relevant agencies, such as the Police, Social Services, Eastern Wellbeing Partnership or Health Care Providers.
	In extreme cases where a mental health condition is suspected, a Mental Health Act 1998 <sup>1</sup> assessment may be requested. Under Section 135 of the Mental Health Act 1998, a warrant may be obtained to enter the home and remove the individual for assessment.
Recording	Document the action taken, including the reason for any referrals.
	Records to be stored in accordance with data protection legislation.
Support	In collaboration with external agencies, offer ongoing support:- <ul style="list-style-type: none"> <li>• Practical support (cleaning, decluttering, repairs)</li> <li>• Emotional/mental health support</li> <li>• Regular monitoring visits</li> </ul>
Review and Monitor	Schedule follow up visits to check progress.
	Case closed when risks are reduced to acceptable levels and tenant is managing independently.
	Document outcome

<sup>1</sup> [Mental Health Act 1998](#)

## 7. Capacity

### 7.1 Presumption of Capacity

- We start by assuming that every adult has the capacity to make decisions, unless a proper assessment shows they cannot.
- Capacity is about specific decisions. Someone might be able to decide what to eat but not how to manage their home.
- For hoarding cases, staff should look at whether the person can make decisions about their belongings and living space.

### 7.2 Principles of the Capacity Act 2003<sup>2</sup>:

- 1) Presumption of Capacity – Adults have the right to make their own choices unless proven otherwise.
- 2) Support to make decisions – Give people all the help they need before deciding they cannot make a choice.
- 3) Unwise Decisions – People may make unusual or risky choices without automatically being seen as lacking capacity.
- 4) Best interests – If someone can't decide, any action taken must be for their benefit.
- 5) Least restrictive option – Do as little as possible to limit their rights and freedoms while keeping them safe.

### 7.3 Capacity Assessment Process

- A first check of capacity does not need a doctor. Staff can use the Initial Mental Capacity Assessment Form (appendix 4).
- The test has two steps –
  - Is there a problem with the person's mind or thinking that affects decision-making?
  - Does that problem affect the specific decision being looked at?
- If the test shows the person lacks capacity, record it and refer to the right external agency.
- Capacity can change over time, so check again when needed.

## 8. AUDIT TRAIL AND DOCUMENTATION

Record all actions clearly so we can show what support we offered, what referrals are made and why.

## 9. CONFIDENTIALITY

- Handle all concerns in strict confidence.
- Share information only with those who need to know to protect the person and provide support.
- Personal data will be protected in accordance with data protection laws.

## 10. DATA PROTECTION and PRIVACY

The data provided will be treated with care and in compliance with the General Data Protection Regulations and the Data Protection Act 2018. Personal data will not be shared with third parties without the individual's consent unless there is a lawful basis for doing so.

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<sup>2</sup> [Capacity Act 2003](#)

The Authority understands the sensitivity of special category data and the information individuals may share with them. Any personal data collected will be stored in line with the Authority's privacy policy<sup>3</sup>.

## **11. RISK MANAGEMENT**

Employees have a right to work in an environment that is free from aggressive, threatening behaviour or abusive behaviour. The Authority is committed to maintain a safe and respectful workplace where all individuals can carry out their duties without fear of harm, intimidation or harassment.

In the event that an employee experiences such behaviour, they will receive immediate support. This may include access to counselling services, guidance from management and a clear process for reporting and addressing incidents.

## **12. FURTHER GUIDANCE**

Due to the complexities of hoarding further guidance and procedures are available through Isle of Man Safeguarding Board at [self-neglect-procedural-guidance.pdf](https://www.isleofman.gov.im/self-neglect-procedural-guidance.pdf)

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<sup>3</sup> Privacy Policy 2022 – <https://www.onchan.org.im/your-commissioners/policies-procedures/board->

## APPENDIX 1 – Clutter Image Rating Scale – Kitchen

### Clutter Image Rating (CIR) – Bedroom

Please use the clutter image rating to assess what level the adult's clutter or hoarding problem is at:

Images 1-3 indicate level 1

Images 4-6 indicate level 2

Images 7-9 indicate level 3

This toolkit should be read in conjunction with IOM Self-Neglect Guidance and Guidance for Working with People who Hoard. Remember to use the tool with sensitivity for the adult, dignity and respect.



1



2



3



4



5



6



7



8



9

# Clutter Image Rating (CIR) – Lounge



## Clutter Image Rating (CIR) – Kitchen



**1**



**2**



**3**



**4**



**5**



**6**



**7**



**8**



**9**

