

# Transport and Environment Committee

10.00am, Tuesday, 28 October 2014

## Trade Waste – Pilot Evaluation and Policy Recommendations

Item number	7.14
Report number	
Executive/routine	
Wards	All

### Executive summary

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The presence of trade waste in Edinburgh's streets has a detrimental impact on the city's appearance, as well as leading to other environmental and public health concerns. A previous report to Committee assessed various options for improving the management of trade waste and recommended the trialling of timed collection windows.

This report assesses the impact of these windows on the affected areas and sets out a policy for dealing with the management of trade waste across the city. The report also details a recent change to the Environmental Protection Act 1990 which gives local authorities powers through service of statutory notice to control the placement of commercial waste containers for emptying, including specifying the time when they must be placed and removed.

### Links

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Coalition pledges	<a href="#">P44</a> , <a href="#">P49</a>
Council outcomes	<a href="#">CO17</a> , <a href="#">CO18</a> , <a href="#">CO19</a> , <a href="#">CO26</a>
Single Outcome Agreement	<a href="#">SO4</a>

## Trade Waste – Pilot Evaluation and Policy Recommendations

### Recommendations

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It is recommended that Committee:

- 1.1 Notes the success of the collection windows in improving the appearance and accessibility of the pilot areas.
- 1.2 Agrees a city-wide policy to minimise trade waste stored or presented for collection on public space.

### Background

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- 2.1 On 29 October 2013 Transport and Environment Committee considered a report on Trade Waste Policy Options which gave an overview of potential solutions that could be implemented to improve the management of trade waste on Edinburgh's streets. Committee approved the recommendation that timed collection windows be trialled in three areas: Rose Street (and its lanes), Leith Walk and High Street. A timed collection approach specifies windows of time in which businesses may place their waste onto the street for collection. Outside these times no waste is permitted on public land.
- 2.2 A further report, Trade Waste Pilot - Update, gave an overview of progress to the Transport and Environment Committee on 18 March 2014. This report focussed on Rose Street and noted that, while the number of containers on street had been reduced significantly, some difficulties were being encountered by both the businesses affected and the trade waste contractors.

### Main report

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- 3.1 The pilots were implemented on a phased basis, with Rose Street beginning on 20 January, Leith Walk on 3 March and High Street on 10 March 2014. Consultation was carried out with the affected businesses to determine the preferred collection times and these were initially agreed as:
  - Rose Street – 09.00 – 10.00, 17.00 – 18.00
  - Leith Walk – 10.00 – 11.30, 14.00 – 15.30
  - High Street – 08.30 – 10.30

- 3.2 Feedback from the businesses, especially those operating in the entertainment and night-time economy, and trade waste contractors was that an additional, evening window was required. A further window of 22.00 – 23.00 was therefore introduced in Rose Street and 21.30 – 22.30 in the High Street.
- 3.3 Engagement has been carried out with the affected businesses as the pilots have progressed, with advice given as to how they can best meet their legal duties to recycle, store and manage their waste appropriately.
- 3.4 Trade waste companies operating in Edinburgh were encouraged to work with their customers to identify alternative solutions. Containers which remained on-street were stickered to notify both business and contractor that they did not have permission to be there and would require to be removed. When necessary, they were removed by Council staff using Roads (Scotland) Act legislation and the trade waste contractors were charged for the uplift and storage costs.
- 3.5 Initially, the intention was to have all waste removed from public space, except during the collection windows. However, pressure from the many bars and restaurants in Rose Street saw a relaxation for food and glass waste. Guidance from the Scottish Environment Protection Agency (SEPA) and Environmental Health is that these waste streams require to be containerised. Containers for food and glass have therefore been tolerated as an interim arrangement, assuming the business responsible agrees to meet certain conditions. These are that the bin capacity must be the minimum necessary and that the bins must be identified, kept locked, clean and tidy.
- 3.6 Enforcement of the windows has been carried out by City Centre and Leith Neighbourhood Environmental Wardens with support from the citywide Edinburgh Wardens and Wardens from other neighbourhoods at weekends. To date, a total of 287 Fixed Penalty Notices have been issued to businesses for illegally depositing their waste in the pilot areas, although not all of these were for issues directly related to the pilot. It is likely this figure would have been higher were it not for the advice and assistance provided by a seconded Project Officer in supplementing these patrols and reminding businesses of their requirements to comply.

### **The success of the collection windows**

- 3.7 The report of 29 October 2014 noted that success would be measured by:
- a reduction in the number of trade waste containers on the streets;
  - a reduction in trade waste derived litter on the streets;
  - businesses managing their waste more responsibly and recycling more; and
  - cost effectiveness i.e. any costs associated with implementation will be offset by savings in street cleaning.

- 3.8 Within the pilot areas, there has been a significant reduction in the number of containers (See Appendix 1 charts, feedback and photographs). In Rose Street, bin numbers reduced from 390 to 103, Leith Walk from 116 to 12 and High Street 37 to 8, giving an average reduction of 81%. This visible impact has been welcomed by local resident and equality groups which have noted positive changes to the streetscape and ease of movement. Drivers of delivery and trade waste vehicles have also acknowledged that the reduction in bins has made the Rose Street Lanes far easier to manoeuvre round.
- 3.9 CIMS (Cleanliness Index Monitoring System) surveys have been carried out in the pilot areas both before and during the pilots. These surveys and information from Street Cleansing staff reveal an improvement in cleanliness. An independent survey of the BID (Business Improvement District) area was commissioned by Essential Edinburgh, and carried out by Keep Scotland Beautiful in July 2014. This noted that, although trade waste was still a major factor impacting on the cleanliness of the area, there was evidence of improvement. In particular, it noted a change to the Adverse Environmental Quality Indicators with a reduction in litter derived from trade waste. Indeed, trade waste was not noted as an issue in Rose Street and its Lanes. In contrast, Meuse Lane which was not included in the pilot area, but which was comparable to the Rose Street Lanes before the implementation of the pilot, was the only location to be assessed as a 'D' grade. The KSB assessor described the cleanliness of the lane as terrible with trade waste being a key factor in their assessment.
- 3.10 Businesses within the pilot areas are using a range of different methods to manage their waste better, such as back-hauling (where delivery vehicles also remove waste), glass crushing, on-site paper shredding and sharing of bins. Within the pilot areas, businesses have been unable to retain general waste or dry recycle bins on-street and have accordingly had to think about how best to manage the different waste streams.
- 3.11 The implementation costs of the pilot have been met from within existing budgets. The original report recommended the establishment of a compliance team. Although a formal team was not put in place work to engage with and inform the businesses has been carried out by two Project Officers seconded to the project. As detailed in paragraph 3.6, enforcement was also carried out by City Centre and Leith Neighbourhood Environmental Wardens, weekend Wardens from other neighbourhoods and the city-wide Edinburgh Wardens.

## **The impact of the collection windows**

3.12 In recommending timed collections, the original report identified the following advantages:

- Streets free from trade waste for the majority of the day;
- Collections timed to take place at the least busy periods;
- Reduction in bags left overnight;
- Little change for trade waste companies; and
- Reduction in spillage and waste derived litter, and subsequent disposal costs.

3.13 In practice, some trade waste continues to be stored on-street at all times with the toleration of food and glass containers. Businesses are allowed to present their waste up to 15 minutes before the window opens. A similar leeway is allowed at the close of the windows before businesses are expected to remove their waste from public space, if it has not been collected.

3.14 Businesses have a duty of care to dispose safely of their waste. It should not be left on-street when the business is unstaffed. For a business to discharge its duty of care, waste collection must inevitably take place during 'normal' working hours. Even within 'normal' working hours, it is not possible to determine collection windows that suit all businesses as different types of businesses require different times. Seasonal fluctuations in opening times were also identified. This was especially an issue with High Street traders.

3.15 Evidence from Night-time Wardens and the Night-time Task Force suggests that the pilot areas have seen a reduction in waste being placed out overnight and this has had a significant impact on cleanliness. However, waste being presented overnight is still identified as a major factor in spilled litter. Any lasting improvement to the management of trade waste would require an effective night-time presence to tackle this.

3.16 Meeting the requirements of the collections windows has required significant changes for those trade waste carriers whose business model is built on the servicing of large on-street containers outwith normal business hours. For them, the requirements of the timed windows has led to increased trips each day to the same areas, routes are potentially delayed whilst they await a window opening and, especially in Rose Street, they can be backed up awaiting access. The increased costs incurred by these contractors will inevitably be passed on to their customers. Health and Safety concerns were also raised as to the potential risks associated with a number of vehicles all trying to access the same area at the same time. This is exacerbated in High Street and Rose Street as restrictions on vehicle access mean that delivery vehicles are also trying to access these areas at the same times. Initial concerns have however largely proved unfounded. Not all contractors are using all windows, some are

subcontracting pick-ups and there has been some staggering of the times they access the pilot areas. Indeed, for other contractors the windows have resulted in positive business benefits with enhanced customer relationships and new services offered to meet their customer needs.

- 3.17 The report of 29 October 2013 also noted that consideration would be given to the impact on the businesses concerned. Feedback has been gathered from businesses throughout the pilots across all areas and also through the completion of a survey. Of businesses across the three pilot areas which responded to the survey 37.5% were satisfied or very satisfied, 12.5% were indifferent and 50% were dissatisfied with collection windows.
- 3.18 The major concern was with contractors failing to meet the collection windows or other issues related to the performance of contractors. Although businesses have been encouraged to find a contractor which can meet their requirements, many are tied into contracts with high financial penalties for early withdrawal.
- 3.19 Other issues identified are:
- The identified times are inconvenient – businesses are not necessarily open during the windows or the times are not suitable. Of the businesses which completed the survey, 49% requested changes to the window times but there was no consistent pattern as to what the windows should be changed to.
  - They currently have insufficient storage space within their business premises to retain waste.
  - More collections equate to an increase in cost.
  - The volume of heavy vehicles and consequent concerns about Health and Safety (Rose Street only)
- 3.20 Businesses which completed the survey were divided as to whether the scheme had improved the appearance of the local area, with 38% finding it had made a positive difference as opposed to 40% who did not. Concerns here were noted about the increased use of bags and consequent spillage of litter and waste left out for extended periods or overnight.
- 3.21 Feedback from businesses gathered individually has indicated a far higher level of satisfaction with the windows and the consequent impact on appearance. In Leith Walk, of 159 face to face visits conducted in April, 139 businesses (87%) found the pilots had had a positive impact on Leith Walk. This has also manifested itself in interest from businesses in other areas keen to see the pilots extended to their trading locations, as they increasingly feel themselves to be operating at a disadvantage.

### **The way forward**

- 3.22 Timed collection windows have been successful in terms of the measures of success for the pilots. However, the lessons learned have indicated that, for

windows to be effective citywide, there will require to be a more flexible approach. This recognises the logistical and routing challenges for carriers and the need to support effective enforcement through a single consistent approach.

- 3.23 The successful outcomes identified in the pilot areas have been driven by changes in the behaviours exhibited by the affected businesses. In turn, these have been brought about by:
- clear and pragmatic guidelines aiming at having the minimum amount of waste stored on public space for the minimum amount of time;
  - education to ensure that businesses meet their legal duty to store and dispose of their waste responsibly, and to recycle as much of that waste as is possible;
  - the removal of general waste containers from public space; and
  - effective enforcement to embed the changes.
- 3.24 Existing legislation gives the Council the authority to control or remove obstructions on public land (Roads (Scotland) Act, 1984, sections 59 and 87) and to determine the size, number and type of containers placed on public space (Environmental Protection Act, 1990, s.47). From 1 January 2014, Waste (Scotland) Regulations 2012 require businesses to take all reasonable steps to recycle as much waste as possible. However, a recent change to legislation has give local authorities increased powers to deal with commercial or industrial waste receptacles. An amendment to the Environmental Protection Act, brought into force on 30 June 2014, gives additional powers through service of a statutory notice to control the placing and removal of containers on the road. Specifically it gives the local authority powers to require the removal of receptacles placed for the purpose of facilitating the emptying of them. It also gives the local authority the power to make provision for the time when the receptacles must be placed for that purpose and removed. This is a significant change to legislation and gives the Council considerably more scope to control the placing and removal of trade waste containers from any road. It should be noted that there is, currently, no Fixed Penalty Notice that can be issued for a breach of this notice. The breach would need to be prosecuted in the Sheriff Court and carries a fine of up to £1000.
- 3.25 To replicate the successful elements of the collection windows across the city, it is proposed that a number of general principles should be implemented, in conjunction with wider, more flexible windows:
- a. No containers will be allowed to be stored on public space.
  - b. Permitted presentation times when waste can be put out on-street should be standardised across the city. The proposed presentation times are:  
9.30 – 12noon; 14.00 – 16.00 and 18.30 – 23.00.

- c. Within these presentation times, waste would only be permitted on-street for up to one hour but otherwise must be retained on the business premises until it is due for collection.
- d. Waste placed on street for collection must be clearly marked with the business name and agreed collection time.
- e. Waste can only be on-street when the business is staffed and never overnight.
- f. Waste containers must be placed as near to the edge of a business's property as is possible, whilst retaining clear pedestrian access. It will no longer be appropriate for business waste to be stored remotely from the business premises.
- g. Food and glass waste must be presented in a secure, sealed container.

3.26 In determining these times, consideration has been given to the following factors:

- Nuisance noise guidance relating to night time collections.
- The emergency services, Lothian Buses and Council Roads team raised issues around bus lane operations, waiting and loading restrictions and peak traffic times between 07.30 – 09.30 and 16.00 – 18.30. Health and Safety concerns were raised by both the Scottish Environmental Services Association and the Health and Safety Executive regarding the 9.00 – 10.00 and 17.00 – 18.00 slots in Rose Street given the pedestrian footfall at these times.
- High footfall between 12.00 and 14.00 would suggest these times are best avoided.
- The use of a 15 minute toleration period before and after each collection window for container presentation and removal purposes.

3.27 On 1 January 2016, Waste (Scotland) Regulations are tightening with businesses which produce over 5kg of food waste per week required to present this for separate collection. It is recommended therefore that 1 January 2016 is the latest date at which all containers require to be removed from public space.

3.28 For businesses, these principles mean they can meet and evidence their 'duty of care' towards their waste. They should also give businesses greater flexibility to manage their waste at a collection time that suits.

3.29 These requirements are only applicable to businesses which choose to use public space to store or present their waste. Businesses which use their own land or an alternate method of disposal would not be affected. Some 20% of businesses surveyed did not use the collection windows, with alternative arrangements including waste collection from within the business's premises and back-hauling in place. Given the pressure on space within the city centre, it is likely that the percentage would be higher across Edinburgh as a whole. Furthermore, as noted above, a number of contractors are introducing new



arrangements to uplift waste without it being stored on public space and these developments should be encouraged.

- 3.30 For contractors, the extension of the windows will also allow for greater flexibility in their routing and should mean they will be better able to meet the needs of their customers. Wider collection windows will also mitigate the requirement for multiple carriers to be accessing the same locations at the same times. To re-route and make the changes from bins to bags or smaller containers, the contractors have advised they would need, on average, a three month lead-in period. They do, however, acknowledge that the behavioural changes required by their customers will take longer to bed in.
- 3.31 Retaining collection windows in this way would allow the Council to exercise control over when waste is on-street and also enable easier identification of issues and subsequent enforcement.

### **Action Plan**

- 3.32 Any decision to require the removal of all containers from public space and to implement permitted presentation times needs to be clearly communicated to the business community. This should be combined with information on the legislative requirements that all businesses are required to meet, in terms of both their recycling and duty of care obligations. Toleration for food and glass containers could be permitted on a temporary basis until 1 January 2016 if businesses can evidence they have no alternative way to manage or store this waste. Further conditions must be met and containers must be kept locked, clean and tidy and stored in an appropriate location, for example within a business's tables and chairs area or, where space permits, by the edge of their property.
- 3.33 To implement this behaviour change a resource is required which can:
- Publicise the guidelines, roles and responsibilities
  - Educate the businesses in their legal requirements
  - Approve on street containers
  - Enforce as necessary – the new powers available in the Environmental Protection Act 1990 will require service of statutory notice on the trader to ensure compliance where necessary. The use of Roads (Scotland) Act powers requires a similar approach.
- 3.34 It is considered that the Environmental Wardens service is best placed to deliver both the implementation of the policy and enforcement as necessary. This will, help to ensure the policy is successful citywide, implemented well, delivered consistently and robustly enforced to gain maximum benefit. For a temporary period a small compliance team will be set up to support, coordinate, engage with businesses, trade waste companies and stakeholders, negotiate and record/evaluate as necessary.

- 3.35 It is proposed that implementation of the policy be rolled out on a phased basis with the aim of achieving full compliance by March 2016. The areas of initial focus would include the city centre and adjacent arterial corridors with the aim to complete this phase within six months. Phase two over the next six months would encompass those areas defined as town centres such as Leith, Gorgie, Corstorphine and Portobello. All other areas would be dealt with in the final phase.

## Measures of success

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- 4.1 Success will be measured by:
- a) a reduction in containers stored in public.
  - b) a reduction in complaints about the storage of waste and associated issues.
  - c) a reduction in street litter.
  - d) businesses managing their waste better and recycling more.
  - e) waste on street being clearly identified with the responsible business name and collection time.

## Financial impact

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- 5.1 To embed effective and lasting behaviour change, a dedicated resource will be required for a temporary period to support the roll out and implementation of the requirements. This may come from existing resources.

## Risk, policy, compliance and governance impact

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- 6.1 The amendment to the Environmental Protection Act 1990 gives significantly more scope to the Council to deal with the placing of trade waste receptacles on the road either for storage or emptying purposes. This came into effect after the commencement of the pilot and will make it easier and simpler to implement controls on the periods when receptacles may be placed and when they must be removed. The proposals also acknowledge the views from the Health and Safety Executive on some aspects of the impact of the pilot. There is no adverse policy impact, risk or governance issue arising from the report.

## Equalities impact

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- 7.1 The storage of waste on public space leads to many health and safety risks – the blocking of fire escapes, sightlines, pedestrian access points and dropped crossings – and its removal therefore contributes to a right to life, health and physical security.

- 7.2 The removal of obstructions from public space will allow people to access public space freely, safely and without fear. This will advance equality of opportunity for people with mobility issues and carers and have a positive impact on groups who may be more vulnerable to crime, or the fear of crime.
- 7.3 Educating businesses in their waste responsibilities also leads to an increased awareness of how they impact on the wider community. The pilots have brought people together as a community by having to deal with similar issues and working together to find shared solutions.

## **Sustainability impact**

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- 8.1 Encouraging businesses to reduce, re-use and recycle their waste will reduce carbon emissions. A robust approach to the management of trade waste will encourage businesses to take more responsibility for their waste, improving the appearance and cleanliness of the local environment and putting sustainability at the core of business operations.
- 8.2 Improving the environment and de-cluttering the streetscape will also help promote personal wellbeing.

## **Consultation and engagement**

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- 9.1 Affected businesses in the three pilot areas were asked to complete on-line surveys both before and during the windows implementation. Meetings have been held with the Rose Street Pub Watch Group, Essential Edinburgh, Royal Mile Business Association and drop-in sessions were also held for Leith Walk businesses. Engagement with a large number of individual businesses has been ongoing throughout the pilot process.
- 9.2 Feedback was sought from local Community Councils, residents' and equalities groups.
- 9.3 A series of meetings have been held with the trade waste contractors, both as a group and individually.
- 9.4 Internal consultation has been held with Neighbourhood Roads, Local Environment and Environmental Warden staff.

## **Background reading/external references**

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[Trade Waste Policy Options](#)

[Trade Waste Pilot – Update](#)

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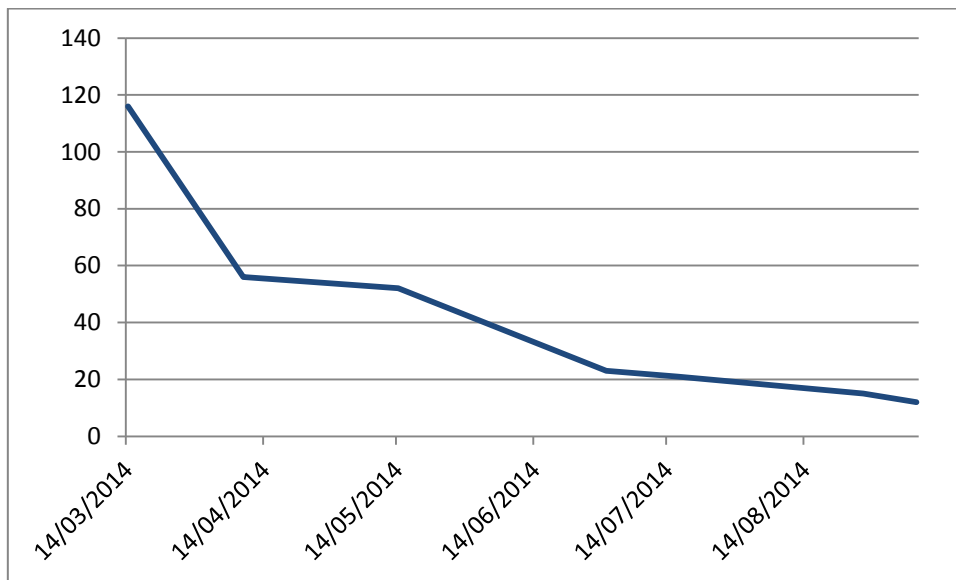
## Links

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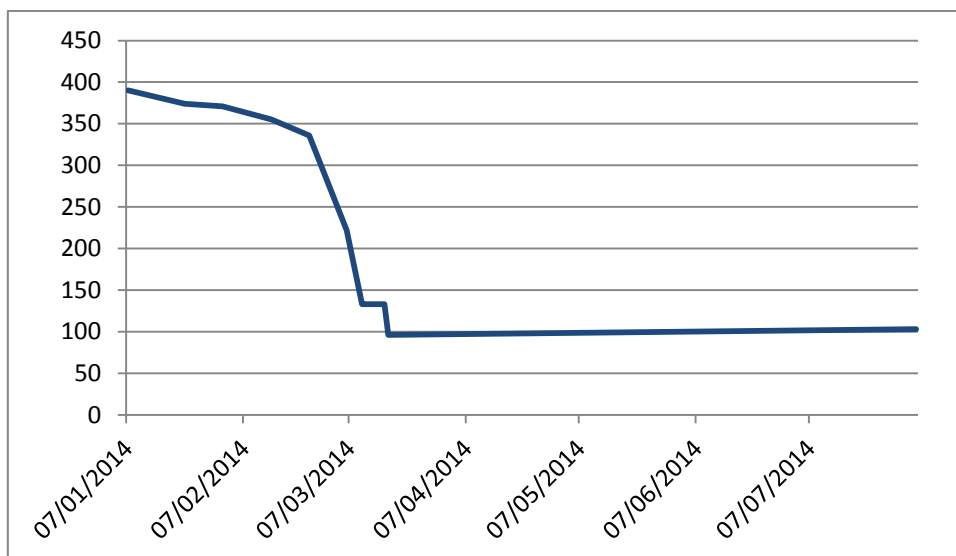
<b>Coalition pledges</b>	P44 – Prioritise keeping our streets clean and attractive P49 – Continue to increase recycling levels across the city and reducing the proportion of waste going to landfill
<b>Council outcomes</b>	CO17 – Clean – Edinburgh’s streets and open spaces are clean and free of litter and graffiti CO18 - Green – We reduce the local environmental impact of our consumption and production CO19 – Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm CO26 – The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives
<b>Single Outcome Agreement</b>	SO4 – Edinburgh’s communities are safer and have improved physical and social fabric
<b>Appendices</b>	Appendix No.1 – Charts, Photographs and Feedback.

## Appendix 1

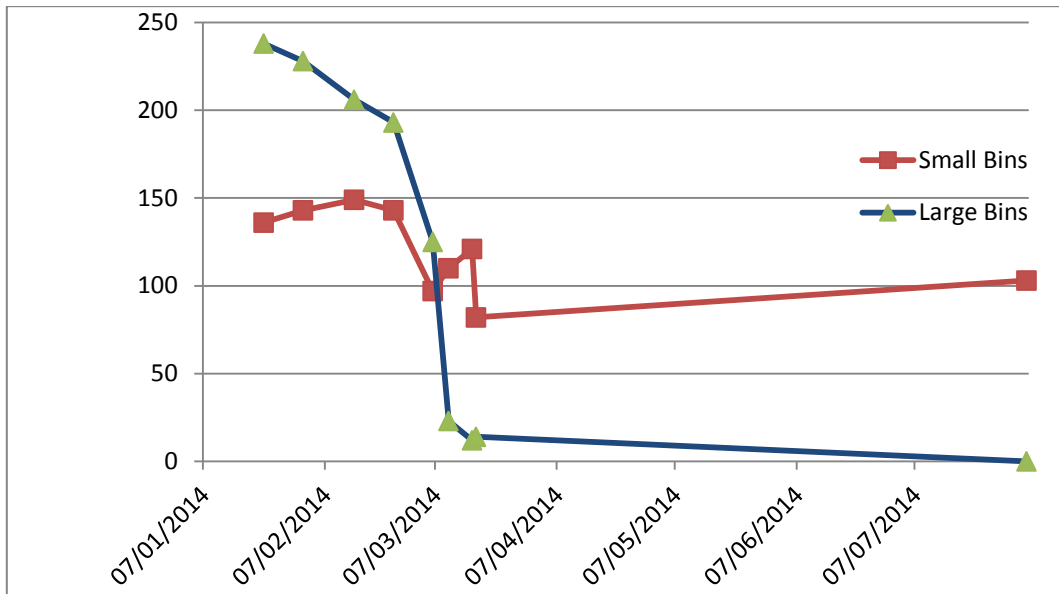
### Number of Bins on Leith Walk



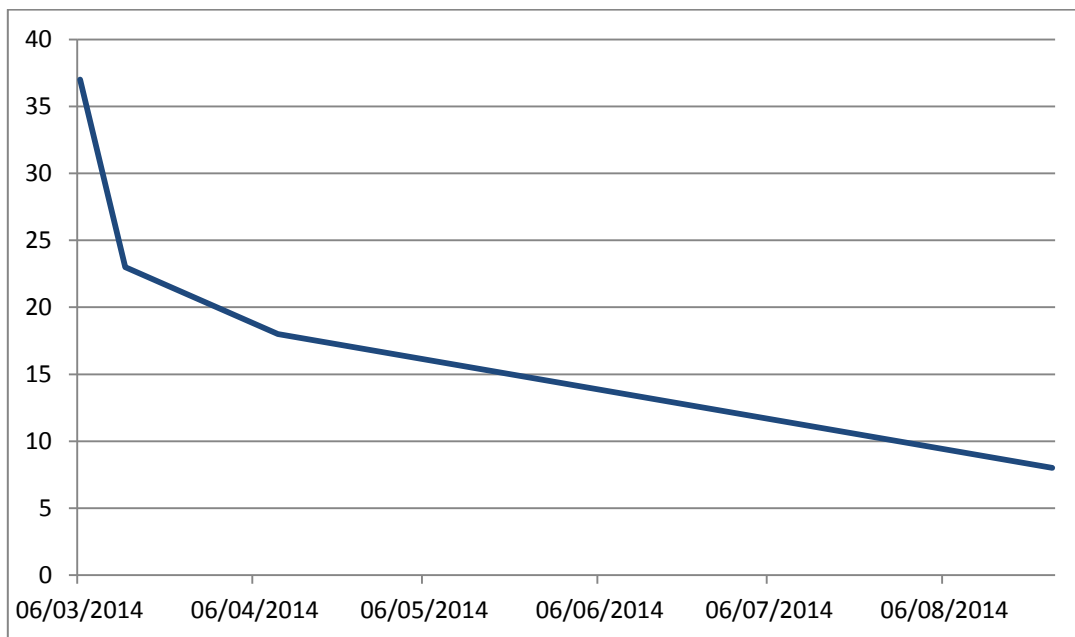
### Number of Bins on Rose Street



**Breakdown of Rose Street bins into large (1280L, 1100L, 660L) and small (Wheelie bins)**



**Numbers of bins on High Street**





Before and After Pictures

Rose Street North Lane





Leith Walk





## Feedback from Equalities Groups, Community Councils and Community Groups

I think the pilot has been a huge success. Would urge the CC to put in a supportive letter - as I fully expect the usual grumpy business "representatives" to complain about it and try and have the whole thing squashed.

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Thank you for the opportunity to comment on the Trade Waste Pilot.

First of all, as a resident of Leith for 35 years until I had to move out to Midlothian and a life member of the Cockburn Association, I obviously welcome any move which enhances the attractiveness and visual appearance of the streets of the city. Certainly the display of bins permanently at the front of premises is very undesirable.

SATA is mainly concerned with public transport and its accessibility, but all journeys involve using streets and our visually impaired and mobility impaired members often have difficulties with street furniture, both fixed and mobile. Bins which are left at the front of shops are a particular problem (as also are A-boards which do not conform to Edinburgh Council's regulations).

As a wheelchair user, I have a particular problem was dropped kerbs (often not conforming to the standards, and sometimes completely missing) but especially when the approach to these is obstructed by bins. I give a particular example, in Barclay Place (image attached). Immediately north of the garage there is a pedestrian crossing with a dropped kerb on a relatively narrow pavement where for several years there have been bins on the one bit of the kerb which is not ramped. This makes getting past on the pavement hazardous. I noticed only yesterday that, at last, these bins have been moved to the other side of the wall and on to the garage forecourt. I can only presume that the garage owner has courteously allowed these bins which presumably take waste from shops down Barclay Place to be on his land. There must be many other similar sites in Edinburgh.

I applaud your initiative with this pilot project, and appreciate why you have chosen a site like Rose Street Lanes where the bins seem to occupy the whole length of the pavement, but I hope that you will extend it to cover isolated bins especially where pavements are narrow and access is limited.

For a wheelchair user Rose Street Lanes is actually one of the least useful schemes as most of the pavements are too narrow or in too bad condition for a wheelchair to use, while at the same time the condition of the setts makes wheelchair travel almost impossible.

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These buckets are a eyesore, the idea of them being taken in and only put out at certain times is a good idea but very few pay attention to this and there is never enough man power to make sure this happens, they are never maintained or cleaned and a lot

are private firms like ■■■ that collect late at night, leith walk also has streets going of it all the way up that are suffering as the rubbish is dumped along them our street being one of them, everything is good on paper but when it comes to reality it rarely works as there is no one to enforce these changes, Europe have the right ideas they have concrete bins which stores under the pavement, recycle plastic and glass bottles in shop and get money of your shopping encouraging kids to recycle, we sadly seem to flog dead horses hope this helps.

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Here are a few impressions of the pilot in Leith Walk (as a pedestrian):

Overall it is an improvement: as intended, it makes pavements easier to navigate for pedestrians, and generally, the streetscape has become more pleasant

There is plenty of work to do, not least in the parts of Leith Walk where the pilot overlapped with the street works, when bins are presented in the wrong slot (see attached example)

Following the said works - sometimes with new layout - it will be important to reinforce the trade waste (and domestic) scheme.

We would be most interested to read the full evaluation of the scheme, and certainly look forward to a full implementation (and city-wide roll-out) before too long.

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Wow! What a difference – I certainly didn't notice anything like the before pictures, so you are doing a good job.

I live by the Shore and although the Shore itself isn't too bad, Fishers opposite the Malmaison is a mess. I actually saw a half eaten rat in amongst their rubbish one day! However, when I went in to the restaurant and told them, it was gone by the time I came back. It's a mess though and I often wonder what the people in the rooms on that side of the Malmaison think when they look out of their windows to see the water and that's staring them in the face. Trouble is, there's little if no rear access on the Shore.

I've been contacting the waste department for two weeks regarding the trade waste bin belonging to the Cruz ship. It has been unoccupied for months now, with no sign of a new Lessee. The bin was overflowing and the seagulls had been at the bags. Within a couple of days, the bin was surrounded by bags and someone had dumped an old carpet! People never fail to amaze me.

Anyway, passing last night I noticed it had at last been emptied and the bags and carpet had been removed. What a difference. I know it's a never ending problem, but I always think even if structures could be put up to store these bins it would make such a difference. I'm sure the owners wouldn't mind doing this themselves – although, knowing some of the owners, perhaps not!

All in all I think you're doing great with a difficult job.

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