

Response ID ANON-N7RC-R7X5-G

Submitted to **Consultation on reforming the UK packaging producer responsibility system**

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About You

1 What is your name?

Name:

Ray Georgeson

2 What is your email address?

Email:

ray.georgeson@resourceassociation.com

3 Please provide information about the organisation/business you represent

Which of the following best describes you?:

Business representative organisation/trade body

What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):

Resource Association

What is the approximate number of staff in your organisation? (if applicable):

If you answered 'Other' above, please provide details::

4 Please provide any further information about your organisation or business activities that you think might help us put your answers in context.

Please answer below:

Resource Association is an advocacy body representing reprocessors and supply chain interests focused on improving the quality, transparency and integrity of recycling in the UK for the benefit of the economy and environment. Our members are spread across a range of interests including collection and sorting of recyclables for our main core of members, reprocessors of materials back into quality products.

Our members represent over £3bn of UK GDP, manage over 7 million tonnes of materials every year and employ more than 12,500 people directly with many more indirectly.

5 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason::

Background

6 Do you agree with the principles proposed for packaging EPR?

Yes

Please briefly state the reasons for your response. Specifically, if you respond No, please identify which principles you do not agree with and explain why.:

Yes, we support the principles, but would like to see more explicit recognition of the need for transparency throughout the supply chain on the collection and processing of recyclables, especially related to the end destination for recycling.

7 Do you agree with the outcomes that a packaging EPR should contribute to?

Yes

If you answered No, please state which outcomes you do not agree with.:

Yes, we agree with the proposed outcomes.

8 Do you think these types of items not currently legally considered as packaging should be in scope of the new packaging EPR system?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Scope should be widened to include products that are 'packaging-like' and often discarded with packaging. These should include single use drinks cups,

sandwich bags and other 'on the go' type packaging formats.

9 Which of these two classifications best fits with how your business categorises packaging?

Neither

If neither, please say why, and provide a description of how your business categorises packaging:

Part A: 1. Full net cost recovery

10 Do you agree with our definition of full net cost recovery?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

The inclusion of non-packaging in the Impact Assessment figures for littering makes proper assessment of 'full net cost recovery' difficult. Separate assessments of the costs of litter clean-up of packaging are needed, as non-packaging litter (such as chewing gum and smoking detritus) should not have the burden of clean-up cost attached to the packaging producers.

We are concerned that including 'disposal' costs in the full net cost definition will not provide sufficient incentive to motivate producers to move packaging from disposal (incineration) towards recycling. If a modulated fee for unrecyclable packaging is hypothecated for use in waste management, this will create a disproportionate stimulus for EFW/incineration routes which we believe to be an undesirable outcome. There should be no additional stimulus for EFW than exists under the present 'recovery PRNs system.

11 Do you agree that producers should be required to fund the costs of collecting and managing household and household-like packaging waste? (i.e. all consumer facing packaging)

Yes

If No, please briefly state the reasons for your response and state what waste you think full net cost recovery should apply to.:

12 Do you agree that packaging for commercial/industrial applications should be out of scope for full net cost recovery?

Yes

If No, please briefly state the reasons for your response.:

13 We would welcome your views on whether or not producers subject to any DRS should also be obligated a under a packaging EPR system for the same packaging items.

Yes they should

Please briefly state the reasons for your response.:

All packaging should be obligated under EPR. We believe that correctly functioning EPR should eliminate the need for an 'all in' DRS system and that full consideration must be given to the scheduling of policy interventions, with EPR and Consistency integrated as the priorities.

Part A: 2. Driving better design of packaging

14 Do you agree with the development of an 'approved list' of recyclable packaging to underpin the setting of either modulated fee rates or deposits?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

We agree with the approved list approach and suggest that this be managed independently from Government and industry but will need careful creation with the right levels of authority and expertise to carry credibility with all stakeholders. It is likely to need a new entity to achieve this.

15 Do you think the payment of modulated fees or the payment of deposits with the prospect of losing some or all of the deposit would be more effective in changing producers' choices towards the use of easy to recycle packaging?

Modulated fee

Please briefly state the reasons for your response and provide any information to support your view.:

We support modulated fees for all packaging types in preference to a deposit scheme, which we believe to be untested and unnecessarily risky.

16 Do you think there could be any unintended consequences in terms of packaging design and use arising from:

Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Modulated fees:

No

Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Deposit (for recyclable packaging) and fee (for non-recyclable packaging):

I don't know / I don't have enough information

Please briefly state the reasons for your response and provide any information to support your view.:

17 Do you agree that the deposit approach should be designed to incentivise more closed loop recycling?

I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.:

We do not support the deposit approach.

Part A: 3. Obligated producers

18 What do you consider to be the most appropriate approach to a single point of compliance, the Brand-owner or the Seller approach?

I don't support moving to a single point of compliance

Please briefly state the reasons for your response and provide any information to support your view.:

We do not support a move to single point of compliance. There is merit in retaining a stake in responsibility for all elements of the supply chain. We are concerned that excessive power and influence of a single player reduces supply chain ownership and impacts on the ability of the reprocessor to exert influence in the operation of the system

19 If a single point of compliance approach was adopted, do you think the de-minimis should be:

Other, please state below

Please briefly state the reasons for your response and provide any information to support your view.:

We believe that, regardless of single point of compliance or not, the de-minimis should be removed for all producers. Fixed compliance fees for SMEs could be adopted and indeed modulated to account for variations in size and impact even amongst SMEs.

20 Should small cafés and restaurants selling takeaway food and drinks whose packaging is disposed 'on the go' be exempt from being obligated?

No

Please briefly state the reasons for your response and provide any information to support your view.:

Fixed compliance fees for SMEs should be introduced, on a sliding scale dependent on size and packaging impact. All producers however small should have a responsibility and a stake under EPR.

21 If shared responsibility is retained, is Option A or Option B preferable for including smaller businesses or the packaging they handle in the system?

Option A (Lower or remove the de-minimis)

Please briefly state the reasons for your response and provide any information to support your view.:

22 If you have stated a preference for A, do you think the de-minimis threshold should:

Be removed entirely

Please briefly state the reasons for your response and provide any information to support your view.:

23 Overall, do you have a preference for maintaining a shared responsibility compliance approach, or moving to a single point of compliance?

Shared responsibility

Please briefly state the reasons for your response and provide any information to support your view.:

We support the continuation of shared responsibility. All stakeholders need to retain a stake and interest in the success of EPR.

24 Do you have a preference for how small businesses could comply?

Pay a flat fee to include a contribution to a communications fund

Please briefly state the reasons for your response and provide any information to support your view.:

Flat fees, graded by size and impact and including a contribution to a Communications Fund

25 Do you think that requiring operators of online marketplaces to take the legal responsibility for the packaging on products for which they facilitate the import would be effective in capturing more of the packaging that is brought into the UK through e-commerce sales?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Absolutely critical to capturing packaging that is in the system and ensuring costs are allocated to where they properly accumulate, ensuring equity. It is time to say farewell to the free-riders.

Part A: 4. Supporting improved collections and infrastructure

26 Do you agree that payments to local authorities for collecting and managing household packaging waste should be based on:

Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - provision of collection services that meet any minimum standard requirements (by nation):

Yes

Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - quantity and quality of target packaging materials collected for recycling:

Yes

Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - cost of managing household packaging waste in residual waste:

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Yes, but it is critical that quality recycling is prioritised and paid for accordingly.

When contributing to the cost of managing packaging in residual waste, producers will need assurance that collection systems and frequencies are optimised for quality recycling. It should not be the duty of producers to effectively prop up council collections that fail to maximise quality recyclates and fall back on residual recovery.

27 Do you think we have considered all of the costs to local authorities of managing packaging waste?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Care however must be taken to ensure that producers are paying for the quality recycling of materials, not incineration.

28 Do you agree with our approach to making payments for the collection of household-like packaging waste for recycling?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

29 Should businesses producing household-like packaging receive a payment for the costs of household-like packaging waste in residual waste?

No

Please briefly state the reasons for your response and provide any information to support your view:

30 Are there other factors, including unintended consequences that should be considered in determining payments to:

Local authorities? Please explain the reasons for your response and provide any information to support your view:

It is critical that producers fees are only used to support high quality recycling and consistent collections systems that support this. If high quality is not achieved then there should be reductions in the support made available.

To achieve consistent high quality will require holistic approaches to collection, sorting, communications and enforcement related to inappropriate household recycling behaviour. Full involvement of producers working together with councils is more likely to produce what should be mutually desirable outcomes.

For the collection and recycling of household-like packaging waste? Please explain the reasons for your response and provide any information to support your view:

The same imperative of supporting high quality recycling should apply.

31 Do you have any information that would help us to establish the costs incurred by local authorities and other organisations of cleaning up littered and fly-tipped packaging items?

Please provide any information below:

No.

32 How do you think producer fees could be used to improve the management of packaging waste generated on-the-go?

Please answer below:

Full effort needed to establish and spread best practice in designing 'on the go' recycling collections, this can be accelerated with producer fees but must work from agreement and evidence of best practice.

33 Do you have any information that would help us to establish the costs of collection and disposal of increased on-the-go provision?

Please answer below:

No.

34 Do you agree that provision for the take back of single-use disposable cups for recycling should continue to be developed a voluntary basis by business prior to a government decision on whether disposable cups are included under an EPR scheme or DRS?

No

Please briefly state the reasons for your response and provide any information to support your view:

Single use disposable cups should be subject to EPR and potentially also as part of an 'on the go' DRS should this be a route the Government insists on continuing to explore.

35 Do you think the recycling of single-use disposable cups would be better managed through a DRS or EPR scheme?

EPR

Please briefly state the reasons for your response and provide any information to support your view:

EPR should be the priority for tackling all packaging recycling, with DRS held as an option in the future should EPR not deliver the desired outcomes of high levels of quality recycling of packaging.

36 Do you think a recycling target should be set for single-use disposable cups?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Yes, we see no reason not to focus on a target, especially as this is explicitly set out in the Single Use Plastic Directive.

Part A: 5. Helping consumers do the right thing – communications and labelling

37 Should producer fees be used to support local service related communications delivered by local authorities?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Yes absolutely, but this needs national co-ordination and the benefit of economies of scale in the production of high quality communications that can be locally tailored, as was successfully delivered in the past when the WRAP Recycle Now campaign had strong funding.

38 Should producer fees be used to support nationally-led communications campaigns in each nation?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Yes, as per Q37 - by a national body with local adaptation - but national campaigns agreed across the UK and efficiently funded and administered by the central EPR function.

39 Are there any circumstances where producers should be exempt from contributing to the cost of communications campaigns?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Yes - only if local campaigns choose to deviate from agreed national criteria and research and use separately derived materials and messages. This has been unhelpful in the past and should be discouraged by the removal of funding support

40 Do you agree it should be mandatory for producers to label their packaging as Recyclable/Not Recyclable?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Yes. We support the OPRL model as a good foundation for the next level of work needed on this. 'Check locally' should be a message that is eliminated from packaging as soon as practically possible - it is confusing and demotivating for consumers.

41 Do you think that the percentage of recycled content should be stated on product packaging?

I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view:

Because the range of recycled content that is desirable and practicable ranges significantly across packaging types and materials, we are not sure that this adds to consumer knowledge. It may serve to disadvantage materials that do well to achieve 'modest' recycled content as the numbers will be lower than for other materials.

By all means this should be revisited as EPR develops and there should be scope for intelligent communications that aid consumer awareness of the value of recycled content in different packaging formats.

42 If you responded yes to the previous question, how could recycled content information be provided to consumers?

Please describe briefly.:

Use of industry averages may be a useful starting point, backed by high quality background information on a website or app also printed on the pack.

43 Do you have any other proposals for a labelling system?

Please describe briefly.:

We support OPRL.

44 Do you have experience to suggest an appropriate lead-in time for businesses to incorporate any mandatory labelling requirements?

Please describe briefly.:

We commend to you the work done by our colleagues in CPI, together with WRAP and OPRL on Recyclability Guidelines for Paper and Board Packaging. This suggests a two-year lead time being workable for most producers.

Part B: 6. Packaging waste recycling targets to 2030

45 In your view, are the estimates made in the Material Flow reports for packaging waste arisings the best available data?

Yes

Please briefly state the reasons for your responses and provide any information to support your view.:

46 Are you aware of any other factors which may affect the estimates of packaging waste entering the waste stream?

No

Please briefly state the reasons for your responses and provide any information to support your view.:

47 In your view, are there other factors which may affect the amounts of obligated tonnage reported?

No

Please briefly state the reasons for your responses and provide any information to support your view.:

48 Do you agree with the packaging waste recycling targets proposed for 2025?

I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view:

There are some concerns around the targets:

* we are uncomfortable supporting lower 2025 targets compared to 2022 without better explanation from the Government. EPR should be increasing recycling throughout.

* we note concerns about calculation methodology and the measurement of recycling at the reprocessor and ask that these are fully accounted for in the targets, which may not be achievable without some adjustment based on the practicalities of the revised calculation methodology.

49 Do you agree with the packaging waste recycling targets proposed for 2030?

I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view:

Q48 answer applies.

50 Please provide your views on the policies and actions that could help us achieve an even higher overall packaging recycling rate, for example 75%, as well as your views on the costs associated with doing so.

Please answer below:

Q 48 and 49 replies apply here also, and we reinforce our view that high quality recycling free of contamination should remain a primary objective. With that, the chance of higher packaging recycling rates increases, with the necessary caveats about the technical limits that start to apply (especially in the paper and board sectors) which must be accounted for.

51 Do you foresee any issues with obtaining and managing nation specific data?

Yes

Please briefly state the reasons for your responses and provide any information to support your view.:

This is one of the reasons we support maintenance of shared responsibility (not single point of compliance) as single point will make it hard to get nation specific on-market data. An additional requirement for packaging 'sellers' to report by nation will be needed.

52 Should a proportion of each material target be met by “closed loop” recycling, e.g. as is the case for glass recycling targets?

No

Please briefly state the reasons for your responses and provide any information to support your view.:

Focus needs to be retained on quality recycling and reduction of contamination. If the legislation is worded to enable addition of 'closed loop' targets as the EPR scheme matures, we would support that.

53 Should government set specific targets for individual formats of composite packaging?

No

If yes, what key categories of composite packaging should be considered?:

Modulated fee structure should be used to steer packaging producers away from harder to recycle composite formats as a general policy objective, removing the risk of market distortion by focusing on individual formats.

54 Do you agree with the proposed interim targets for 2021 and 2022 set out in Table 6?

I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.:

55 Do you agree with the proposal to increase the allocation method percentage to 35% for 2021 and 2022?

I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.:

Part C: 7. Governance Models

56 Overall, which governance model for packaging EPR do you prefer?

Model 1

Please briefly explain your preference.:

We support a hybrid approach using Model 1 and Model 2. We see merits in the hybrid model promoted by Ecosurety as a 'centralised competition model' www.ecosurety.com/centralised-competition-model which also has much in common with the hybrid proposal from Valpak.

We do not support Model 4 which is unproven and untested anywhere and in our view carries excessive risks relative to the possible outcomes.

57 If you had to modify any of the models in any way to make them better suited to achieve the principles and outcomes government has set for packaging EPR what changes would you suggest?

Please describe briefly.:

Q56 answer applies.

Regardless of model, we still wish to see much greater transparency injected into the system for reporting on actual recycling and its end destination. Our End Destination of Recycling Charter was a valiant attempt at a voluntary agreement to encourage councils to report on what actually happened to their recycling and where it went, but it suffers from the voluntary approach and the resistance of many in the supply chain of MRF operators and exporters who regard this as commercially confidential, when in fact the absence of transparency hampers public confidence in the recycling process.

58 Do you have any concerns about the feasibility of implementing any of the proposed governance models?

Yes

If yes, please provide specific reasons and supporting information for each governance models that you have concerns about:

Yes - Model 4 - Q56 answer applies

59 Do you think that any of the governance models better enable a UK-wide approach to packaging producer responsibility to be maintained whilst respecting devolved responsibilities?

Please describe briefly.:

Proposed hybrids from Ecosurety and Valpak will lend themselves to a UK-wide approach

60 Stakeholders have suggested that a compliance fee mechanism similar to the arrangements currently in place under the WEEE producer responsibility scheme should be introduced if a competitive evidence market continues to operate such as in Model 1. Do you agree?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

61 Should a Packaging Advisory Board be established to oversee the functioning of the EPR system and the compliance schemes in the competitive compliance scheme model 1 or do you think other arrangements should be put in place?

Packaging Advisory Board

Please briefly state the reasons for your response and provide any information to support your view.:

This entity needs wide representation of interests across the packaging supply chain.

62 Please let us know your thoughts as to whether the proposed single management organisation should be established on a not-for-profit basis or as a government Arm's Length Organisation.

Please answer below:

We agree the body should be a not-for-profit, managed and controlled by producers but with a strong multi-stakeholder advisory forum and clear lines of accountability for the delivery of the system.

63 If such a management organisation is established as not-for-profit, one option is for government to invite proposals from potential operators and then issue a licence to operate for a defined period of time. Do you agree with this approach?

Yes

If no, would you like to suggest an alternative approach?:

We consider a ten-year license to be a practical minimum, given the complexity of the set up and initial delivery.

64 Should a single scheme be established for household/household-like packaging and C&I packaging as described for model 2?

No

Please briefly state the reasons for your response and provide any information to support your view.:

65 Or, should there be a separate system for managing compliance for household/household-like packaging and C&I packaging as described for model 3?

No

If yes: could model 3 work as described? Or would additional mechanisms be required to make this approach work effectively? Please indicate what these might be.:

If no: do you have suggestions for an alternative approach?:

We commend the Ecosurety hybrid model for further consideration by Government.

66 Under model 4 are producers more likely to:

Join a compliance scheme?

Please briefly state the reasons for your response and provide any information to support your view.:

We do not support Model 4.

Part C: 8. Responsible management of packaging waste domestically and globally

67 Do you agree that government should seek to ensure export of packaging waste is undertaken in a transparent and environmentally responsible manner?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

This should already be happening and remains a great source of disappointment that this question even needs to be asked. Failure to adequately police illegal exports of contaminated recyclables have played a big part in the current predicament of UK recycling, overly dependent on febrile export markets with poor regulation and no transparency on end destination or efficacy of recycling route.

68 Do you agree that measures identified here would help ensure the export of packaging waste is undertaken in a transparent and environmentally responsible manner?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

With the addition of mandatory reporting of recycling end destination, now we believe an imperative rather than a voluntary approach.

69 Have we missed potential measures that you believe need to be considered alongside those measures we have proposed?

Yes

If yes, please explain which potential measures should be considered.:

More consideration needed of measures to stimulate domestic reprocessing capacity across many materials as a preference to febrile and unregulated exports.

70 Do you have any concerns about the feasibility and / or costs of implementing any of the proposed measures?

No

If yes, please provide specific reasons and supporting information for each measure that you have concerns about:

Those responsible for exports should be bearing full costs of proper inspections and policing of the system to improve the reputation of UK recycling and reinforce the positioning of those reputable operators in the business.

Part C: 9. A more transparent system

71 Do you agree that accredited reprocessors and exporters should be required to report their financial information?

Yes

Please briefly state the reasons for your response and provide any information to support your view. If you answered no, how would you suggest transparency is provided on how income from the sale of evidence has been used to support capacity building?:

Yes, for all financial information relevant to EPR management.

72 Should accredited reprocessors and exporters be required to generate evidence for every tonne of packaging waste that they process?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

73 Should accredited reprocessors and exporters be required to report on the packaging waste they handle monthly?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

74 Do you think that any additional measures to those already described would be required to ensure transparent operating of the evidence market in model 4?

I don't know

If yes, please provide details:

We do not support Model 4.

75 Are there any additional requirements that should be placed on compliance schemes to ensure greater transparency of their operations and reporting?

Yes

If Yes, please briefly state the reasons for your response and provide any information to support your view.:

Consideration should be given to the role of compliance in reporting on end destination and achieving transparency that the public demands. This needs more work, but there may be scope for joint statutory duty to report , alongside local authorities.

76 Under a reformed system do you think compliance schemes should continue to be approved by the existing regulators or do you think a different approach is required?

Yes, approved as now

Please explain below:

77 Are there any additional requirements of a single producer organisation to ensure transparency of its operation and reporting?

Yes

If yes, please briefly state the reasons for your response and provide any information to support your view.:

Nolan Principles should apply, and there should be full financial reporting related to EPR management.

78 Do you think there is a need to make more information on packaging available to consumers?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

Simple information on recyclability, backed up with apps/websites that inform on recycled content and the end destination of recycling.

Part C: 10. Compliance monitoring and enforcement

79 Are there other datasets that will be required in order to monitor producers in any of the proposed models?

Yes

If yes please explain which datasets will be needed:

Market data by nation if single point of compliance is adopted, despite our many reservations.

80 Is there a specific material, packaging type or industry sector whereby producing accurate data is an issue?

Yes

If yes, please provide further information on where producing accurate data may be an issue. :

SME data gathering will be challenging and need special attention.

81 Do you think a single database, as opposed to the current range of methodologies available, would be an effective alternative?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

82 Do you agree that compliance schemes (models 1 and 3), the producer management organisation (model 2) or the scheme administrator (model 4) should be responsible for carrying out audits of producers, which should be reportable to the regulators?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

83 Do you support the broadening of legally enforceable notices to obtain required information?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

84 Are there other enforcement mechanisms that should be considered which would be timely and effective to bring producers into compliance, for example in relation to free riders?

Yes

If yes, please explain which other enforcement mechanisms should be considered:

We support a limited-period amnesty for free-riders in order to encourage registration, followed by punitive enforcement for those that continue to wilfully ignore the legislation.

85 Are there any further data that should be required to be collated / collected via compliance schemes or a single management organisation?

Please provide brief details.:

This looks comprehensive.

86 Do you think a penalty charge, as described, is the correct lever to ensure packaging recycling targets are met?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

87 Should stakeholders other than reprocessors or exporters be able to issue evidence of recycling?

No

Please briefly state the reasons for your response and provide any information to support your view.:

Only those able to provide definitive proof of the end destination and use of the material should be issuing evidence - the reprocessor.

88 Are there any additional enforcement powers that should be applied to waste sorters, MRFs and transfer stations handling packaging waste?

No

Please briefly state the reasons for your response and provide any information to support your view.:

Proper enforcement of existing statutes and powers ought to be capable of delivering, provided they are used properly. This has not been the case to date for example, with the MF Regulations, but this should be capable of being addressed in the review of that legislation.

89 Do you agree with the proposed amendments to enforcement powers relating to reprocessors and exporters?

Not Answered

Please briefly state the reasons for your response and provide any information to support your view.:

90 Do you have any evidence to indicate that under any of the proposed governance models the likelihood of waste packaging being imported and claimed as UK packaging waste might increase?

No

If yes, please provide information on any evidence you have:

91 Is the current requirement for a sampling and inspection plan and subsequent auditing by the regulator sufficient to address any misclassification of imported packaging waste?

Yes

Please briefly state the reasons for your response and provide any information to support your view.:

92 Are there other mechanisms that could be considered that would prevent imported UK packaging waste being claimed as UK packaging waste under the proposed governance models?

Yes

If yes, please explain which other mechanisms could prevent imported packaging waste being claimed as UK packaging waste:

Yes. A statement of compliance from sellers of recovered materials stating that they are UK derived should be required between operators in the supply chain, in order that those knowingly marketing imported packaging as UK derived are guilty of a statutory offence.

11. Estimated costs and benefits

93 Do you have any additional data or information that will help us to further assess the costs and benefits (monetised or non-monetised) that these reforms will have?

Please answer below:

No.

94 Do you have further comments on our impact assessment, including the evidence, data and assumptions used? Please be specific.

Please answer below:

No.

12. Further comments

95 If you have any other views or evidence that you think we should be considering when reforming the packaging waste regulations, which you have not yet shared, please add them here.

Please answer below:

It is critical that the next stage of this process, a further consultation once the Government has honed down its choices, fully involves all stakeholders in what will be a very detailed scrutiny. We are confident that the Government recognises this and will act accordingly.

Consultee Feedback on the Online Survey

96 Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.: