



SPC Engage Conference

23 October 2019

Paul Vanston, CEO, INCPEN

Industry Council for Packaging and the Environment



@incpen

@paulvanston





ArdaghGroup



M&S

Plastipak
PACKAGING



Unilever

TESCO



P&G

Warburton's
Family Butlers



Sainsbury's



Huhtamaki

CLEAN TECH
A PLASTIPAK COMPANY



Coca-Cola



Industry Council climate position

The Industry Council **supports** and **acts** on helping to deliver the objectives of the Paris Agreement on Climate Change.

The Industry Council supports implementation of effective measures consistent with the upper limit of ambition set out in the Paris Agreement, namely limiting the increase in global temperatures to 1.5 degrees centigrade above pre-industrial levels.

We believe this means achieving a world of net zero emissions by 2050.

Four (yes, FOUR) 'Member States' govern on resources policies in UK

England



Department
for Environment
Food & Rural Affairs

Policy paper
Draft Environment (Principles and Governance) Bill 2018 policy paper

Updated 23 July 2019

WASTE AND RESOURCE EFFICIENCY

Producer responsibility

- 44 Producer responsibility obligations
- 45 Producer responsibility obligations: Northern Ireland
- 46 Producer responsibility for disposal costs

Resource efficiency

- 47 Resource efficiency information
- 48 Resource efficiency requirements
- 49 Deposit schemes
- 50 Charges for single use plastic items
- 51 Charges for carrier bags

Managing waste

- 52 Separation of waste: England
- 53 Separation of waste: Northern Ireland
- 54 Electronic waste tracking: Great Britain
- 55 Electronic waste tracking: Northern Ireland
- 56 Hazardous waste: England and Wales
- 57 Hazardous waste: Northern Ireland
- 58 Transfrontier shipments of waste

Waste enforcement and regulation

- 59 Powers to make charging schemes
- 60 Waste charging: Northern Ireland
- 61 Enforcement powers
- 62 Enforcement powers: Northern Ireland
- 63 Littering enforcement
- 64 Fixed penalty notices
- 65 Regulation of polluting activities
- 66 Waste regulation: amendment of Northern Ireland Order

Northern Ireland



Department of
**Agriculture, Environment
and Rural Affairs**

Waste Management Plan for Northern Ireland

2019

Packaging and Producer Responsibility

Packaging fulfils an important role. It protects food and other goods on the journey from where they are made to where they are used. Its key role is to avoid spoilage and damage, which create waste, in the supply system and in the home. However, reducing packaging, without harming functionality, as well as using refillable and reusable packaging, can save businesses money, reduce waste for them and deliver environmental benefits.

The UK, including Northern Ireland transposed the requirements of the Packaging and Packaging Waste (94/62/EC, amended by EC Directives 1882/2003, 2004/12, and 2005/20, and EC Regulation 219/2009/EC) through the Packaging (Essential Requirements) Regulations 2003⁷² (as amended) which implements the single market and optimisation aspects of the Packaging Directive and the Producer Responsibility Obligations (Packaging Waste) Regulations (Northern Ireland) 2007⁷³ (as amended), (using the enabling powers of the Producer Responsibility Obligations (Northern Ireland) Order 1998⁷⁴) which establishes a 'producer responsibility' regime and set targets for the recycling and recovery of packaging waste.

The Producer Responsibility Regulations make producers (i.e. businesses that manufacture, import and sell certain products) responsible for ensuring a proportion of their products are recycled and recovered once they have reached the end of their life.

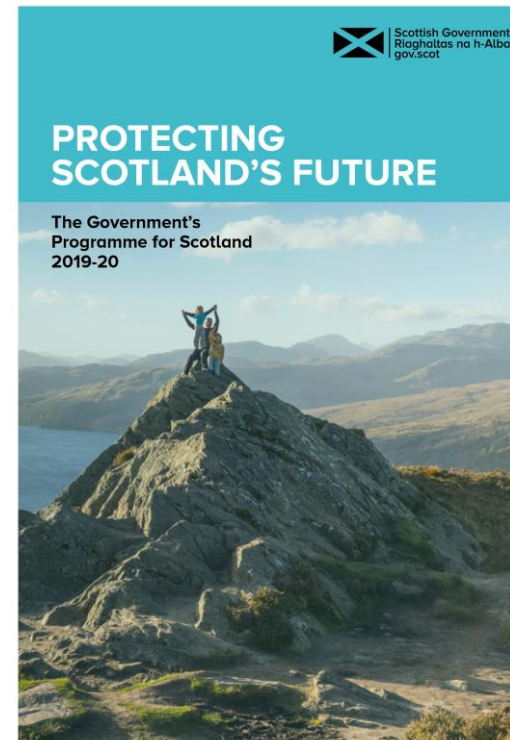
Targets are in place until 2020, which will mean an increase in recycling for plastics, aluminium and split targets for glass based on the end use (i.e. remelt or aggregate). The targets will deliver environmental and economic benefits as well as ensure the UK continues to meet the rWFD targets.

Northern Ireland has recently joined with other devolved administrations in consulting on extending producer responsibility for packaging. This would extend producer responsibility for a product to the post-use stage. This incentivises producers to design their products to make it easier for them to be re-used, dismantled and/or recycled at end of life. In addition, Northern Ireland has also jointly consulted on the introduction of a Deposit Return Scheme, to help reduce litter and increase recycling. Further consultations on these policy changes are expected, and Northern Ireland will decide how to take these measures forward in due course. This is without prejudice to the views of incoming Ministers.

Scotland



Scottish Government
Riaghaltas na h-Alba
gov.scot



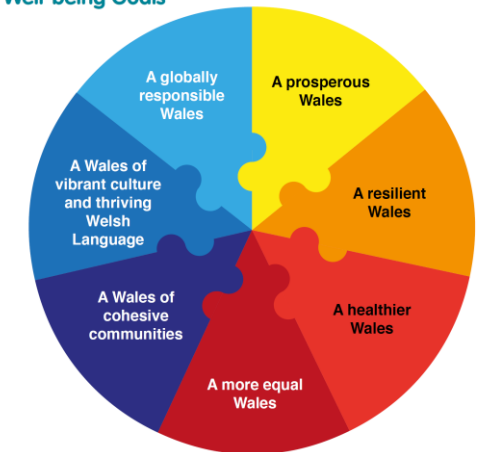
Wales



Llywodraeth Cymru
Welsh Government

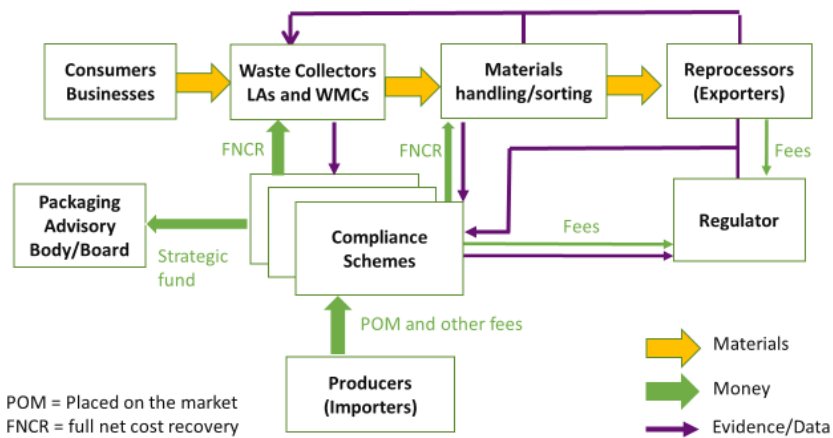
Well-being of Future Generations (Wales) Act 2015

Well-being Goals



UK's four Packaging EPR models in its 2019 consultation

Model 1: System as now but with FNCR; retains multiple compliance schemes



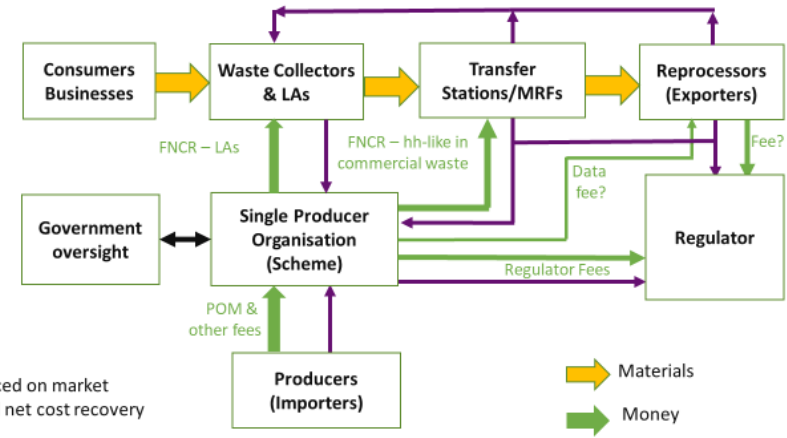
POM = Placed on the market
FNCR = full net cost recovery

➡ Materials
➡ Money
➡ Evidence/Data

Important: these are INCPEN's representations based on the R&W Strategy and the Gov't consultations.



Model 2: Single not-for-profit producer organisation



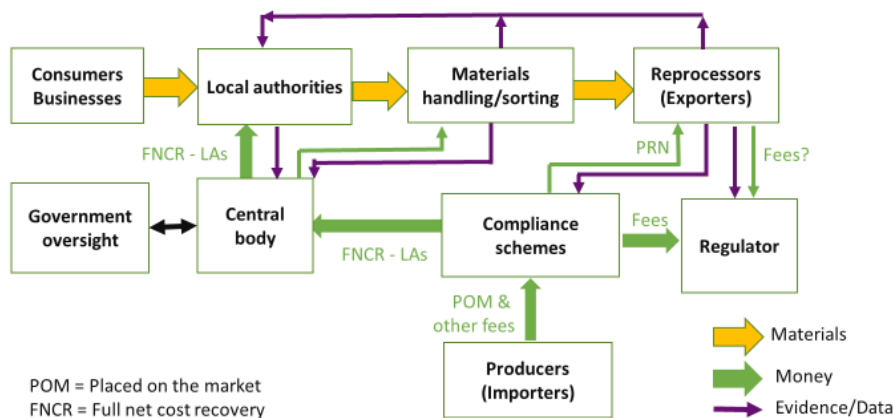
POM = Placed on market
FNCR = Full net cost recovery

➡ Materials
➡ Money
➡ Evidence/Data

Important: these are INCPEN's representations based on the R&W Strategy and the Gov't consultations.



Model 3: Single not-for-profit producer organisation for household packaging ... and market-based evidence system for C&I packaging



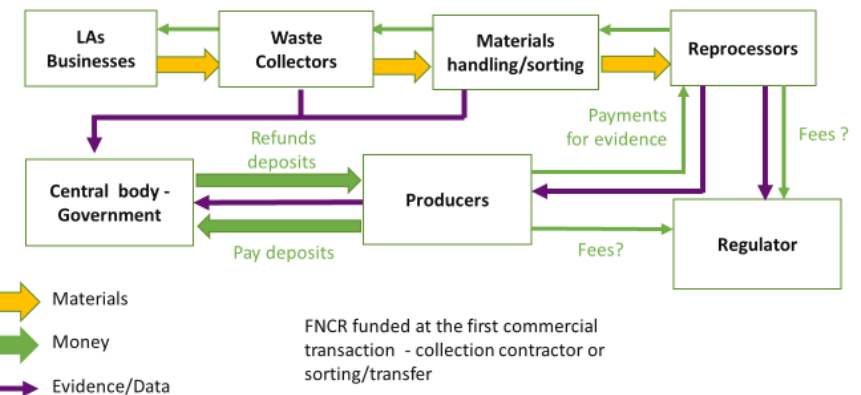
POM = Placed on the market
FNCR = Full net cost recovery

➡ Materials
➡ Money
➡ Evidence/Data

Important: these are INCPEN's representations based on the R&W Strategy and the Gov't consultations.



Model 4: Deposit Fee system with Full Net Cost Recovery (FNCR) payments



FNCR funded at the first commercial transaction - collection contractor or sorting/transfer

➡ Materials
➡ Money
➡ Evidence/Data

Important: these are INCPEN's representations based on the R&W Strategy and the Gov't consultations.



Article 8a: define clear roles and responsibilities of all relevant actors

'Article 8a

General minimum requirements for extended producer responsibility schemes

1. Where extended producer responsibility schemes are established in accordance with Article 8(1), including pursuant to other legislative acts of the Union, Member States shall:
 - (a) define in a clear way the roles and responsibilities of all relevant actors involved, including producers of products placing products on the market of the Member State, organisations implementing extended producer responsibility obligations on their behalf, private or public waste operators, local authorities and, where appropriate, re-use and preparing for re-use operators and social economy enterprises;

Article 8a: an EPR reporting system

Article 8a

General minimum requirements for extended producer responsibility schemes

- (c) ensure that a reporting system is in place to gather data on the products placed on the market of the Member State by the producers of products subject to extended producer responsibility and data on the collection and treatment of waste resulting from those products specifying, where appropriate, the waste material flows, as well as other data relevant for the purposes of point (b);

What we currently have is clunky, not sufficiently joined-up, and creates different drivers for the sectors

Local councils have **non-statutory targets** and the **Waste Data Flow** reporting system

Obligated producers have **statutory targets** and the **National Packaging Waste Database** reporting system

Article 8a: EPR necessary funding for cost-efficient services

4. Member States shall take the necessary measures to ensure that the financial contributions paid by the producer of the product to comply with its extended producer responsibility obligations:

(a) cover the following costs for the products that the producer puts on the market in the Member State concerned:

- costs of separate collection of waste and its subsequent transport and treatment, including treatment necessary to meet the Union waste management targets, and **costs necessary** to meet other targets and objectives as referred to in point (b) of paragraph 1, taking into account the revenues from re-use, from sales of secondary raw material from its products and from unclaimed deposit fees,
- costs of providing adequate information to waste holders in accordance with paragraph 2,
- costs of data gathering and reporting in accordance with point (c) of paragraph 1.

This point shall not apply to extended producer responsibility schemes established pursuant to Directive 2000/53/EC, 2006/66/EC or 2012/19/EU;

(b) in the case of collective fulfilment of extended producer responsibility obligations, are modulated, where possible, for individual products or groups of similar products, notably by taking into account their durability, reparability, re-usability and recyclability and the presence of hazardous substances, thereby taking **a life-cycle approach and aligned with the requirements set by relevant Union law, and where available, based on harmonised criteria in order to ensure a smooth functioning of the internal market;** and

(c) do not exceed the costs that are necessary to provide waste management services in a cost-efficient way. Such costs shall be established in a transparent way between the actors concerned.

Some timescales – impacts on implementation of EPR and DRS?

By 5 July 2020	Transposition of EU Directives on circular economy package
April 2021	DRS in Scotland up and running
6 May 2021	Scottish Govt and Welsh Assembly elections
Sometime in 2022	Plastics Packaging Tax
By 5 January 2023	Compliance with EPR requirements
[Insert date]	General Election

What do these timescales mean for setting-up implementation of EPR and DRS?

Principles are good – but value chain agreements on the detail are even better.

1. All sectors needs to shift in some ways (and some parts within sectors more than others) because: -

- **Packaging formats** are sometimes sub-optimal for the best recycling outcomes;
- **Recycling collections** are sometimes sub-optimal for the best recycling outcomes; and
- **Recycling sorting facilities** are sometimes sub-optimal for the best recycling outcomes.

**Our ideal state:
eradicate sub-optimal**

2. Packaging reforms and recycling collections reforms must dovetail so that: -

- Money **raised** by the system needs to **stay** within the same system to **spend on the parts that need it**;
- Substantial new funding must help **turbo-boost recycling performance** towards, and past, 65%+; and
- The packaging value chain must **transparently determine necessary costs and cost-efficient services**.

3. The new system must ‘stay the course’ for 20 years or more, which means: -

- **UK-wide common systems** will drive optimal finances, operations, infrastructure and outcomes;
- **Systems are easy to understand, use, maintain and change** for businesses, councils, recyclers, regulators, governments;
- The whole value chain must **engage effectively**; don’t ‘disagree by accident’; and
- We create and maintain substantial citizen support across the UK – we need a truly ‘**national recycling culture**’.



‘Thank you’.



@paulvanston @incpen

