



Department  
for Environment  
Food & Rural Affairs

[www.gov.uk/defra](http://www.gov.uk/defra)

**Consultation on proposed changes to the Waste Batteries Regulations 2009, PRO (Packaging Waste) Regulations 2007, PRO (Packaging Waste) Regulations (Northern Ireland) 2007, and call for evidence on the impact of new plastic flow figures, and links with household waste recycling targets.**

**Summary of responses**

**13 October 2015**



Llywodraeth Cymru  
Welsh Government



Department of  
the Environment  
[www.doeni.gov.uk](http://www.doeni.gov.uk)



The Scottish  
Government  
Riaghaltas na h-Alba



© Crown copyright 2015

You may re-use this information (excluding logos) free of charge in any format or medium, under the terms of the Open Government Licence v.3. To view this licence visit [www.nationalarchives.gov.uk/doc/open-government-licence/version/3/](http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/) or email [PSI@nationalarchives.gsi.gov.uk](mailto:PSI@nationalarchives.gsi.gov.uk)

This publication is available at [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

Any enquiries regarding this publication should be sent to us at

[packaging@defra.gsi.gov.uk](mailto:packaging@defra.gsi.gov.uk)

## Contents

Introduction .....	1
Background.....	1
About this document .....	1
Consultation questions .....	2
Summary of responses: group breakdown .....	3
Responses to proposed regulatory changes: batteries.....	3
Responses to proposed regulatory changes: packaging .....	4
Responses for call for evidence on impacts of new Plastic Flow figures .....	6
Responses to call for evidence to support options for meeting the 2020 household waste recycling target .....	12
Responses outside the scope of the consultation.....	14
Annex 1: List of respondents .....	16

## Introduction

This document summarises the responses to the government consultation which ran between 27 March and 22 May on proposals to amend the Producer Responsibility Obligations (Packaging Waste) Regulations 2007, the Producer Responsibility Obligations (Packaging Waste) Regulations (Northern Ireland) 2007 and the Waste Batteries and Accumulators Regulations 2009. The consultation also sought evidence which would enable us to assess the case for changing the business target for the recycling and recovery of plastic waste packaging; and explore the opportunities for increasing the links between the producer responsibility regime for packaging and Local Authorities collection of packaging waste for recycling.

Overall consultees responded positively to the government's proposed regulatory changes. The corresponding regulations will now be laid before Parliament for implementation from 1<sup>st</sup> January 2016.

## Background

The regulatory amendments covered by the consultation paper will reduce the burden of producer responsibility obligations on business by improving the effectiveness of the schemes. This should enable both the compliance schemes and environment agencies to focus on the schemes' primary aim; delivering environmental benefit by subsidising the recycling of packaging and batteries. The government will notify the EU of proposed changes as required under the EU Technical Standards Directive (Directive 98/34/EC), allowing regulations to be made in time for the start of 2016. The consultation also called for evidence of the impact of a change to business plastic packaging recycling targets and evidence about the opportunities for the producer responsibility obligation to support the achievement of household waste recycling targets.

## About this document

This document provides a summary of the responses received. It does not attempt to repeat the background information given in the consultation paper and only provides a limited amount of context for the proposals and related questions. Please refer to the consultation document for detailed information which is available [here](#).

For each question this document states the questions asked in the consultation document, summarises the responses to the question and then provides a government response to the issues raised.

## Consultation questions

Question 1 (Batteries) - Do you agree with the government's proposal to replace operational plans and annual confirmation of scheme approval as set out above? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 2 (Batteries) - Do you agree that the "appropriate person" should be allowed to delegate responsibility for signing off reports? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 3 (Batteries) - Do you agree that the requirement for an independent audit report should be removed? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 4 (Packaging) - Do you agree with the government's proposal to replace operational plans and conditions of scheme registration with conditions for scheme approval as set out above? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 5 (Packaging) - Do you agree with the government's proposal to transfer the approvals process from the appropriate authority to the appropriate agency? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 6 (Packaging) - Do you agree that the "approved person" should be allowed to delegate responsibility for signing off reports? Please set out your reasons and include any evidence that would improve our assessment of the impacts of the proposals.

Question 7 (Plastics) - Do you have any evidence to support or refute the assumption made in Plastic Flow that the total weight of plastic packaging placed on the market will continue to be steady from 2015 to 2017?

Question 8 (Plastics) - Are you able to share with us any modelling or evidence that shows how PRN (Packaging Recovery Note) prices could respond to target changes?

Question 9 (Plastics) - Do you have other evidence about the potential impacts of keeping the plastic targets as they are, or changing them?

Question 10 (Household Recycling) - Do you have any evidence about the opportunities and barriers, costs and benefits for producers and compliance schemes to work with Local Authorities to increase the extent of collection of household packaging waste for recycling?

## Summary of responses: group breakdown

A total of 53 responses were received to the consultation.

Table 1 – Number of responses by broad category of respondent:

Type of organisation	Number of Responses
Producer Compliance Schemes	15
Producers	6
Advisory Organisations	11
Trade associations	17
Regional/Local government	4

## Responses to proposed regulatory changes: batteries

### Question 1 - Do you agree with the government's proposal to replace operational plans and annual confirmation of scheme approval as set out above?

There were 23 responses and 83% agreed with the proposal or did not provide a firm response either way. Those that agreed welcomed the benefits of the proposal in terms of reducing administrative burdens on both public and private sectors. They also felt this would improve consistency across producer responsibility regimes while still appropriately supporting regulatory control. Nevertheless, some felt that more clarity was needed regarding capacities of the environment agencies to take action. Those that specifically disagreed were often supportive of simplification, but concerned that the powers of the regulators would be adversely affected, as they felt the operational plans ensured that the scheme considers how it will meet obligations and provides the template for the regulators to monitor performance. There was disagreement amongst consultees about the likely cost savings: some thought that the proposal would result in much smaller cost savings than detailed in the impact assessment, while others thought those savings were underestimated. Some also thought that these savings would mostly benefit the environment agencies, because compliance schemes would likely continue to dedicate significant time to operational plans as they are important good practices.

## **Question 2 - Do you agree that the “appropriate person” should be allowed to delegate responsibility for signing off reports?**

There were 24 responses and 100% agreed with the proposal or did not provide a firm response either way. Those that agreed generally believed that the proposal would result in a quicker, and more efficient and flexible process. They anticipated that it would also facilitate the selection of a responsible person with the most appropriate knowledge and experience of a specific topic area. However in general across the respondent groups several that agreed made suggested variations to the proposal, including the possibility to delegate responsibility to more than one person. Some of the businesses responding appear to have delegated responsibility without a legal basis for doing so and therefore worry that a formal process could add bureaucracy to the process. Variations proposed included use of an approved delegated form of authority and that arrangements should be made directly with the compliance scheme and not the relevant agency.

## **Question 3 - Do you agree that the requirement for an independent audit report should be removed?**

There were 21 responses and 81% agreed with the proposal or did not provide a firm response either way. Some noted that audit reports are not used by the environment agencies for compliance purposes, so are of no use. The reliability and impartiality of the audit reports were also an area of concern, while a key identified benefit of the proposal was that it would result in improved consistency across producer responsibility regimes. While agreeing with the proposal or not providing a firm response, some nevertheless mentioned the need to adequately monitor the reliability and robustness of alternative processes. Those that disagreed felt that an independent audit ensures an organisation is operating legitimately, that fraud could occur in the absence of audits, and that schemes may need to consider undertaking their own audits, potentially adding to burdens. It was even proposed that instead of being removed from the batteries regulations, the requirement should be extended to the WEEE and packaging regulations to tackle concerns about lack of transparency.

## **Responses to proposed regulatory changes: packaging**

### **Question 4 - Do you agree with the government’s proposal to replace operational plans and conditions of scheme registration with conditions for scheme approval as set out above?**

There were 41 responses and 85% agreed with the proposal or did not provide a firm response either way. Those that agreed generally believed that the proposal would result in less administrative burden. Some also thought it would positively change the registration

system from a “tick-box” exercise, difficult to complete given the lack of ability for businesses to predict their activity in the medium to long-term, to a more flexible system, providing a better insight of the PRN/PERN market. Amongst this group, there were nevertheless a number of concerns. This included having a system that appropriately and consistently monitors producers and schemes, to ensure compliance with regulations, accurate data reporting, transparency and meeting of standards (e.g. financial robustness of schemes). Some respondents also suggested that large compliance schemes and producers, that place over 500 tonnes of packaging on the market, should be required to submit simplified plans, to help regulators having a better insight of the market and of progress towards compliance.

Those that specifically disagreed were often supportive of simplification, but thought the level of cost savings would be insignificant. Many were concerned that the powers of regulators would be adversely affected, as operational plans were perceived as a way to ensure that schemes consider how they will meet obligations and provide the template for the regulators to monitor performance. One respondent suggested that the proposal should be amended so that compliance with the Packaging Compliance Schemes’ Voluntary Code of Practice is included within the Conditions of Scheme Approval.

### **Question 5 - Do you agree with the government’s proposal to transfer the approvals process from the appropriate authority to the appropriate agency?**

There were 37 responses and 100% agreed with the proposal or did not provide a firm response either way to the proposal. Most thought that the proposal was making sense since the agencies are perceived to be better placed to assess applications, and the new system would provide more consistency of procedures across the producer responsibility regimes. There was mention of the need to ensure consistency of the approvals process across the different agencies, as well as the possibility to include an appropriate appeals/dispute process, should approval not be granted. One respondent also mentioned the possibility to make applications publically available, for transparency and to ensure free market principles are met.

### **Question 6 - Do you agree that the “approved person” should be allowed to delegate responsibility for signing off reports?**

There were 42 responses and 95% agreed with the proposal or did not provide a firm response either way. One respondent disagreed on the basis that the signing off should be the exclusive responsibility of the director. Most respondents that agreed welcomed the proposal as they perceived it would allow for simplifying the process, making it more efficient and ensuring that the person with the most appropriate technical knowledge and experience of the topic area is given responsibility. However, a number of respondents who agreed feared that the proposal could or would add bureaucracy to the process, and there was also mention of the need to make it clear that the director would ultimately retain legal responsibility. Several of those that agreed made suggested variations to the



proposal, including that this should be amended to specify a minimum 3 year approval period, to reflect the fact that responsibility for signing off reports is often required only once a year. Some respondents also mentioned the possibility to make the system more flexible, by allowing more than one delegated person, or by giving responsibility to a specific “job position” and not to a specific person within the company, to ensure minimal disturbance when staff movements occur. Some respondents also mentioned the need for some guidance from the agencies on how to delegate responsibility. A number stated that compliance schemes rather than agencies should manage the system, except for large producers directly registering with the agencies, and that an appropriate “audit trail of responsibility” should be in place to trace the legitimacy of the delegated person. There was also a proposal that producers provide a statement allowing delegation and that to deter under-reporting of packaging volumes that companies should enter on annual returns to Companies House whether or not they are above or below the de-minimis.

## Responses for call for evidence on impacts of new Plastic Flow figures

### **Question 7 - Do you have any evidence to support or refute the assumption made in Plastic Flow that the total weight of plastic packaging placed on the market will continue to be steady from 2015 to 2017?**

There were 26 responses with a large majority clearly supporting the Plastic Flow report or offering no further specific evidence. A number of observations and suggestions were offered, and included:

#### **Specific support**

- some respondents stated that it was important to regularly reassess placed on the market figures, and that the results of the Plastic Flow report have provided the most comprehensive and accurate summary of plastic packaging placed on the UK market.

#### **Creating stability**

- some respondents suggested that in order to best account for changes in the plastic packaging market, going forward, an adjustment mechanism is put in place, for example based on annual obligated data reporting.

#### **Potential impact of target changes**

- if Plastic Flow is accurate and the target was to be amended the UK should meet the 2017 target comfortably without the need to place an additional cost burden on producers. However the potential risk of reducing the target could mean a more challenging growth curve to meet a significant rise in the EU Directive target;

- no changes should be considered unless strong and transparent evidence is provided and subsequently agreed with the steering group which convened to agree the data in the current report.
- one respondent suggested better accounting for the use of packaging waste in the vehicle manufacturer sector. This packaging is generally re-used and has a long life span (more than 10 years), meaning there is a long “time lag” between when it is placed on the market, and then recycled to generate PRNs/PERNs.

## Plastic volumes and data

- some respondents stated they cannot see any reasons for the total weight of plastic packaging placed on the market to increase.
- nevertheless, some respondents gave some suggestions regarding the methodology used to setup targets. This included:
  - getting more data to increase robustness in target settings and performance predictions;
  - ensuring the “bigger picture” is appropriately captured, in terms of interaction between markets for different materials (e.g. glass versus plastic packaging), impact of legislation changes and role played by the closure of a number of UK recyclers in 2014-2015, which makes an appropriate control of operators and performance more difficult;
- some respondents also suggested that some areas would require further investigation. This included:
  - further investigating levels of imported packaging, as they have increased, which would suggest some data elements would benefit from further investigation;
  - investigating the pack filling sector. Conversion and selling has increased in line with the change in target percentage but not pack filling. Positive views are that this may be a genuine reduction in usage and/or the impact of several years of light-weighting, but a concern is that it may be due to underreporting because of increases the price of PRNs (Packaging Recovery Notes).
  - assessing the rise of increased use of light-weight packaging and the lack of any real increase in plastic packaging since 2006. The positive impact of an increased use in light-weight packaging is supported by several respondents, including one in the media industry linking a reduction in the amount of packaging to the use of lighter plastic (polythene) packaging, but also to a decrease in print figures. Another respondent also related the use of lighter packaging to the positive impact of the Courtauld Agreements, as illustrated by the plastic film industry.
  - taking into account the switch of some electrical product producers from plastic to cardboard packaging, as a more environmentally-friendly option.
  - accounting for the impact of having widened the collection of household plastic containers from plastic bottles only to all types of plastic containers. This is perceived to increase contamination levels and therefore has an impact on collection and processing costs.
  - accounting for the popular use of plastic packaging for mail order businesses, many of whom do not have an obligation.

## **Question 8 - Are you able to share with us any modelling or evidence that shows how PRN (Packaging Recovery Note) prices could respond to target changes?**

There were 19 responses with 9 not offering specific evidence, but the majority broadly noting that there are previous historical indicators to suggest that PRN prices will respond to an intention to change targets. A target reduction, whilst likely to reduce PRN prices, will also in the longer term reduce funds for further development. At the opposite, target increases are likely to raise the price of obtaining evidence. A number of observations and suggestions were offered, including:

### **PRN prices**

- high PRN prices attract fraud, which distorts the market and increases its volatility, making it impossible for either reprocessors or producers to budget in advance. As a result the system does not properly support the market, contributing to its fragility and increasing the chance of market failures when other factors, such as the drop in oil prices, come into play.

### **Creating stability and transparency**

- the impact of significant known target increases can be significantly less than the impact of uncertainty;
- increases in plastic recovery targets should be predictable, so that all parties, schemes and reprocessors, can evolve and deliver stable progression. Steps that introduce uncertainty will impact on investments in this area and will generate instability;
- call for the provision of monthly UK wide recycling data being published rather than the quarterly publication we have at present. The publication of more frequent data would help reduce the price rises and falls that are currently seen with quarterly data;
- budgeting is impossible for either reprocessors or producers, as there appears to be too much 'flex' in the current system;
- it is absolutely imperative that current 2017 targets are extended until 2020 to take the 'heat and volatility out of the system';
- approaches to mitigate artificial short term PRN price volatility must be considered as it can be difficult to manage and often does not reflect the underlying performance against targets. It is therefore proposed that a mechanism is introduced to create a more stable short term value which creates a PRN market which is easier for the producers and compliance schemes to manage and budget;
- there is a need for the PRN funding to be more transparent. It is believed very little funding is attributed to communications. In comparison, £7.5m has been 'retained for future investment' over the last three years with over 70% of that by those issuing export PRN's. Amendments to the accepted PRN spend categories and a

better understanding of where these funds are used against established priorities is needed;

- a default minimum value for plastic PRN's of £20 per tonne should be considered for 2016 and 2017, and reviewed at the end of that period. The floor price would be reset at the beginning of each year. There are models such as the carbon floor price which provide a reference point for this approach. The expected benefits would include additional confidence in PRN values for producer budgeting each year, and encouragement for reprocessors and exporters to be registered and accredited every year;
- a mechanism is needed to restrict the volatility of the short term plastic PRN price. This would take the form of a percentage limit on the monthly value range changes applied to a PRN using an independent and public reference point;
- achievement of the 2016 and 2017 targets should be delayed to 2020.

### **Potential impact of target changes**

- reductions in targets are likely to reduce PRN prices in the short term, but this will only serve to reduce the funds available to further develop recycling infrastructure in the UK, along with expanding and developing new export routes in order to meet the future business targets.
- reducing demand on plastic recycling targets will reduce income of the recyclers and increase the likelihood of further closures. Raising the target will increase the cost to business across the whole of the UK.
- it is not believed that maintaining the target recycling levels will automatically create significant additional producer responsibility burden if the collection, handling and reprocessing infrastructure capacity exists or is developed. However this would be subject to UK or export markets being available to handle and process the required tonnage each year, and this is of particular importance in current market conditions.

### **Volumes and data**

- it is not clear how much of the recent increases in recycling is attributed to the legal requirement for business to segregate recyclables and if this has now peaked. If it has, there is a question as to how much more plastic needs to be extracted from the household waste stream to meet increased targets and if there is a market for such a product.

### **Domestic and international market impacts**

- the Chinese Green fence had a significant impact on the plastic PRN market in 2013, and more recently, low crude oil prices have heaped pressure onto the plastic recycling industry.
- creating a more positive and acceptable view of export markets based on a better understanding of those markets is critical, particularly non EU or non OECD destinations.

## **Question 9 - Do you have other evidence about the potential impacts of keeping the plastic targets as they are, or changing them?**

There were 25 responses with 15 not offering specific evidence on a change to targets. A number of observations and suggestions were offered, including:

### **Potential impact of target changes**

- it is very difficult to set targets that create a manageable and consistent PRN price, but conversely it is very easy to set a target that undermines the whole pricing structure for a material.
- it is better to have progressive and clearly defined targets, rather than uncertain changes.
- call on government to extend the time period for the targets to be achieved to 2020 and also restate the obligated target to make it consistent with achieving an overall target of 42% by 2020 and not the 47% that is required at present.
- a reduction in targets would reduce plastic PRN prices as demand for PRNs is reduced. However a reduction in PRN income for the plastic reprocessing industry could be very hard hitting and reduce the amount of investment (as does the lack of targets beyond 2017) being made in UK plastic reprocessing in the coming years.
- it is important to reflect on the changes that came as a consequence of the publication of the glass flow report, i.e. low target changes led to large fall in PRN prices as the industry had no difficulty to meet targets. This is welcomed by producers, but does not help to increase recycling and support investment in the recycling sector.
- one option to conciliate the need to meet European targets and therefore support investment while limiting the impact on producers would be to spread the increase in targets across a longer period.
- approaching 2017, PRN prices are likely to increase as driven by the predicted gap between actual recycling rates and targets.
- significant increases in targets often relate to a peak in fraud which requires more robust auditing to be put in place to tackle the issue.
- the government should not proceed with the current business targets to 2017 and that the plastic business targets should be revised to reach a level of 54.5% by 2020, increasing at 1.5% pa from the current 47%.

### **Creating stability and transparency**

- even, annual steps should be set for the intervening years from 2016 to 2020 as this approach has been consistently demonstrated to produce the lowest overall medium term cost to producers.
- it is important to ensure that targets are fair and equitable between competing materials.
- any revision in targets should ensure there is appropriate communication between local authorities and producers, to identify best ways to meet targets.

- given the drop in oil prices, there is a lot of pressure on reprocessors, and it is therefore important to ensure that any change in targets does not put even more pressure on the domestic reprocessing industry.
- UK should not “embellish” EU targets as this would decrease competitiveness of UK businesses.
- the PRN system is too variable and uncertain to provide support for long term investment.
- the new classification of PET flake as reprocessing has led to PRNs being issue for the same material a large number of times.
- plastic packaging originating from Southern Ireland are being issued PRNs in the UK while they have already been issued recycling credits in their country of origin.
- granulated or baled non-packaging materials are being issued PRNs/PERNs in the UK.

### **Volumes and data**

- the legal requirement for businesses to segregate recyclables was introduced in October 2012 and waste collectors were quick to respond and it was an opportunity to sell more bins. This in turn led to more commercial plastics being collected and thus additional PRN/PERNS. Taking the amount of material collected in 2012 against 2014 it has shown a 24% increase. A simplistic view would be if the trend increases then achieving and extra 31% of additional material collected should be achievable.

### **PRN prices**

- a spike in prices could drive short term behaviour to try to meet targets, but would not necessarily address structural concerns relating to UK plastics recycling.

## **Responses to call for evidence to support options for meeting the 2020 household waste recycling target**

### **Question 10 - Do you have any evidence about the opportunities and barriers, costs and benefits for producers and compliance schemes to work with Local Authorities to increase the extent of collection of household packaging waste for recycling?**

There were 36 responses. Evidence, observations and suggestions grouped under broad headings include that:

#### **Regulatory**

- local authorities (LAs) should be able to benefit from PRN revenue, if they raise high quality material for recycling. LAs can then potentially negotiate reduced costs

with the waste industry. Domestic recycling industry could then be stimulated by limiting revenue to LAs from PRNs and not PERNs (exports).

- for commercial, economic and legal reasons it is currently impossible for schemes to work with LAs for the fear of not being competitive. The key to change this is a legislative driver i.e. collection targets along with the existing recycling and recovery targets. LAs could then issue collection notes which could be brought by producers and compliance schemes.
- local Authorities contract out collection to third parties up to 25 years in length, which effectively isolates compliance schemes or producers from direct contact with local authorities

## **Funding**

- any changes to the PRN system should divert more funding to LAs to deliver more high quality household waste for recycling.
- information on funding and revenues should be more transparent.
- the system should be revised so that payments to LAs are linked directly to the amount of dry recyclables, by material type, which they recycle on an annual basis.
- compliance schemes should divert some of the PRN revenue to the Pledge for Plastics campaign.
- landfill taxes, civil sanctions, carrier bag levy funding and DCLG funds should be joined up with LA priorities on household plastic recycling.
- there should be a better balance of responsibility between LAs and producers for the cost of recycling.
- producers should pay a greater share of the costs to manage their materials. In the UK obligated companies pay about 10% of these costs compared to 100% in many other EU Member States.
- the current PRN system could work very well for local authorities especially with opportunities such as 'end of waste' providing local authorities to have more direct access to PRN revenue as a collector.
- producers should not have to pay because of those LAs who have over-contracted long term waste disposal contracts for tonnage that the LA does not have.
- the system used in Belgium stands out as an example of best practice where high recycling rates are achieved at a relatively low cost for compliance.
- consumer education and encouragement to recycle in the home is vital.

## **Consumers**

- consistent communications is a key to ensuring that the clearest message is delivered to the householder. The Consumer Information Obligation needs to be tightened up to force retailers to properly engage in consumer focussed communications activity, rather than the compliance schemes discharging the obligation through "low level" activity.
- the PRN funds allocated for developing communication strategies refer to trade and corporate communications, rather than consumer facing communications which is an identified priority. Stable and ongoing funding support for programmes such as



Pledge 4 Plastics will help local authorities to achieve increased plastic collections, and also give producers an opportunity to financially help with consumer engagement activities.

- the widening of the specification for household plastic container collections (i.e. from plastic bottles only to all plastic containers) appears to lead to an increase in contamination levels, as households interpret the specification 'generously'. This impact has a negative implication for collection and processing costs.

#### Other

- any steps towards bringing LAs in should be carefully considered and must involve industry engagement.
- a deposit refund system could be factored into the collection, storage and re-processing of packaging. Zero Waste Scotland has published a report about this.
- in order to ensure that the overall 50% target is met by 2020, we suggest that other areas such as organic waste and newspaper waste are likely to be better opportunities and need to be examined further.
- whilst there is debate on the exact percentage that packaging represents in the municipal waste stream, there is collective agreement that it represents a minority and is decreasing.
- reintroducing deposit schemes would be expensive for consumers and in countries such as the UK, with an established collection infrastructure they have been found to have minimal impact on overall recycling rates.

## Responses outside the scope of the consultation

There were 6 responses which were linked to the broad topic, but did not specifically relate to the questions raised. Broadly the following points raised include that:

- the regulations in general are overly complex, require significant effort by industries such as producers (for a relatively trivial liability) and support a whole group of Compliance Scheme companies.
- some other EU countries have implemented much simpler schemes to comply with the EU's directive and there must be a strong case for the UK being able to do the same.
- the consultation just proposes minor amendments whilst retaining the onerous central pillars of the regulations.
- since the Waste Packaging Regulations are intended to reduce domestic landfill it seems inappropriate for the scheme to include packaging that is provided on business to business goods.
- any measures which place an additional burden on the larger producers by increasing the de-minimis threshold is not a fair approach.
- the government revisit many of the proposals that have previously been put aside for reconsideration.

- no other compliance systems introduced into the UK has benefitted from the same degree of price transparency as that enjoyed within the packaging obligations.
- each year there is always a large surplus of wood PRNs in the market place, in 2014 we had 19,000MT (15% of all packaging recycled) of additional PRNs that couldn't be sold. There are significant additional volumes of wood that could be recycled, therefore wood recycling targets should be revised, and increased from 22%.

# Annex 1: List of respondents

360 Environmental

Advisory Committee on Packaging

Alliance for Beverage Cartons and the Environment (ACE) UK

Aluminium Packaging Recycling Organisation (Alupro)

Arc21

BatteryBack

Biffa Waste Services Ltd

Bogod Group Ltd

British & Irish Portable Battery Association

British Beer & Pub Association

British Glass

British Plastics Federation

British Retail Consortium

British Soft Drinks Association

Chartered Institution of Wastes Management NI

Chemical Business Association

Community Resources Network Scotland

Compliance Link

Comply Direct

Confederation of Paper Industries

DHL Envirosolutions

Ecosurety

Environmental Packaging Solutions

Environmental Services Association

European Recycling Platform  
Food and Drink Federation  
Häfele U.K. Limited  
Horticultural Trades Association  
Immediate Media  
J Williams & Associates  
Kent Resource Partnership  
Kronospan Ltd  
Leicestershire County Council  
Local Authority Recycling Advisory Committee  
Local Government Association  
National Association of Waste Disposal Officers  
Nlpack/Scotpack  
Omya UK Ltd  
Outpace Packaging Solutions  
Packaging and Films Association  
Packaging Matters  
Properpak Ltd  
Purolite  
RECYCLING Of Used Plastics Ltd (RECOUP)  
REPIC  
Society of Motor Manufacturers and Traders Limited  
Sustain Drinks Packaging Partnership  
SWS Compak  
Synergy Compliance Ltd  
Tech UK

The Environment Exchange (t2e)

Valpak

Wastepack Group Limited