

From: [REDACTED]

Sent on: Tuesday, May 25, 2021 1:46:49 PM

To: [REDACTED]

CC: [REDACTED]; Preston, Chris <[REDACTED]>

Subject: INCPEN Board: some key responses: EPR Q19, 74, 34, 79, 96, 97 & 98 ... and DRS Q12 & 18

Dear Defra, DAERA, Scottish Govt and Welsh Govt Colleagues,

As you may know, the INCPEN membership comprises an array of very large brand-owners, retailers, manufacturers and recyclers. We held our Board meeting on Friday where we finalised INCPEN's positions on a number of key EPR and DRS questions.

I thought you'd wish to be aware, as follows ...

- [REDACTED]
- [REDACTED]
- **DRS Q12** (All-in v on-the-go): **support ALL-IN** (no support voiced for on-the-go).
- **DRS Q18** (which materials): **support plastic and aluminium. A resounding & persuasive case has *not* been made for glass to be in a DRS** (though we were very open to being persuaded). Consequently, the jury remains out. As Scotland is 8% of the UK population, it should not be a default that the 92% in England, N.Ireland and Wales simply does what Scotland says (the so-called domino effect). Additionally, if a 'digital DRS' is brought-in to allow citizens to use kerbside for heavy materials, we're struggling to see why moving away from kerbside in the first place is the best option (for glass).

Suffice to say, **MASSIVE problems with the timelines**: no-one volunteered confidence the aggressive timelines for the governments and stakeholders could be delivered in practice. Way too many potential pitfalls ahead to be confident of 'plain sailing' for the whole of the next two/three years.

Those views influenced responses to these Qs ...

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Those are some of the highlights. The INCPEN response is likely to filter through to responses from other organisations – indeed, last Friday INCPEN convened meetings with 60 organisations where we examined the results of a big 'collation exercise' done by INCPEN across many orgs. Fair to say there was a lot of common ground at the beginning of those meetings ... and even more by the end of them.

Hope this is a helpful heads-up. Like most others, we'll be submitting our responses into Citizen Space.

My best wishes, [REDACTED]