

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

EC1.1 Enterprise Centre, Coventry Technology Park, Coventry CV1 2TT

Response to the Defra consultation into:

Introducing a Plastics Packaging Tax

About the EPF

The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually Chartered in environmental practice, science and engineering disciplines.

Introduction

The resources and waste sector in the UK stands at a critical juncture. The areas covered in these four consultations – packaging producer responsibility, consistency in recycling collection and the use of financial incentives as a means of encouraging the adoption of more sustainable practices – via a Plastic Packaging Tax and Deposit Return Scheme – are central to the UK's commitment to a more sustainable future. We applaud the ambition of the Resources and Waste Strategy, insofar as it reflects the potential for the UK to take an international lead on tackling environmental challenges by wholly transforming its resources and waste sector.

In considering these four consultations, overarching priorities identified by EPF include:

- insofar as is possible, given the devolved nature of waste policy, the need for a consistent UK-wide policy framework to support the overarching environmental and behavioural change objectives articulated in the consultations
- the need for 'whole system' data and transparency to accurately monitor performance against objectives and targets, to identify and rectify any areas of sub-optimal performance, and to enable cost-effective enforcement – all of which will be critical to success.

Response to the Consultation into Introducing a Plastics Packaging Tax

EPF welcomes the opportunity to consider how fiscal incentives might be used to stimulate stronger and more stable market demand for secondary materials, in this case for recycled plastics, to promote more circular resource consumption. The potential role and effectiveness this type of intervention has been discussed for over a decade, in the context of addressing system failures where public policy priorities on recycling are not adequately supported by a wholly market-led approach. However, the consultation raises a number of important questions that have not been adequately dealt with.

It does not acknowledge the complex task of balancing supply and demand and the alignment of the timing of the tax with the reformed Packaging Producer Responsibility and Collection Consistency proposals, and the introduction of a DRS. Measures being proposed across these three consultations are focused on increasing the quantity and quality of packaging that is captured for recycling and subsequently recycled and have an important role to play in ensuring that UK plastics packaging manufacturers have access to sufficient volumes of high quality recycle.

This is not the case currently – many UK manufacturers are obliged to source recycled content from outside the UK and competing demand for this material will increase as a result of the EU proposal for a 35% recycled content requirement for beverage bottles by 2025.

Ensuring that the tax delivers the stated aim of behaviour change will require:

- more high quality plastic packaging captured from the waste stream
- changes to Packaging Producer Responsibility to remove the incentive for export and reduce poor quality/illegal exports
- increased UK-based plastics reprocessing capacity.

Without these conditions being met to an appropriate timeline, it is possible that UK packaging manufacturers may be unable to fulfil the recycled content requirements on the grounds of availability and/or cost of the material. Unfulfilled demand-side pressure for material could also impact negatively on other manufacturing sectors that also use recycled plastic content, such as building products and automotive components. EPF would like to see an Impact Assessment that takes these considerations into account and provides a clear rationale for the proposed introduction date of 2022.

Furthermore, EPF notes that there has been no confirmation of how the revenue from this 'behaviour change' tax might be used to support the environmental outcomes that underpin the current set of proposals, other than the statement in the Budget 2018 that "the revenue that is collected from these measures will enable investment in actions that will address the issues surrounding single-use plastics, waste and litter to help improve the waste system in the UK". EPF would welcome further detail on how the revenue will be used.

In addition, given this is a UK-wide tax, the fair allocation of the revenue across the four UK countries is also essential to support initiatives such as the recent announcement by Welsh Government of a £6.5m fund to stimulate the market uptake of recycled materials.

Professor William Pope
Chair, Environmental Policy Forum
Chair, Society for the Environment

Pat Jennings
Head of Policy & Communications,
Chartered Institution of Wastes
Management



Terry Fuller
CEO, Chartered Institution of Water and
Environmental Management



Dr Colin Church
CEO, The Institute of Materials, Minerals
and Mining



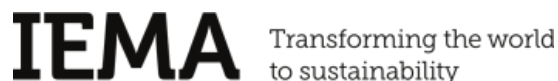
Adam Donnan
CEO, Institution of Environmental
Sciences



Dr Emma Wilcox
CEO, Society for the Environment



Martin Baxter
Chief Policy Advisor, IEMA



Notes

1. The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually Chartered in environmental practice, science and engineering disciplines.

www.socenv.org.uk/EPF

2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing around 6,000 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues.

www.ciwm.co.uk

3. The Chartered Institution of Water and Environmental Management (CIWEM) is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector.

www.ciwem.org

4. The Institute of Materials, Minerals and Mining (IOM3) is a major UK engineering institution whose activities encompass the whole materials cycle, from exploration and extraction, through characterisation, processing, forming, finishing and application, to product recycling and land reuse. It exists to promote and develop all aspects of materials science and engineering, geology, mining and associated technologies, mineral and petroleum engineering and extraction metallurgy, as a leading authority in the worldwide materials and mining community.

<https://www.iom3.org/>

5. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making.

www.the-ies.org

6. The Society for the Environment (SocEnv) is comprised of 25 Licenced Bodies, with

over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism.

www.socenv.org.uk

7. The Institute of Environmental Management and Assessment (IEMA) is the membership body for more than 14,000 environment and sustainability professionals worldwide. We support individuals and organisations in setting and achieving globally recognised standards for sustainable practice, in turn driving the development and uptake of sustainability skills. We add value for our members by providing the knowledge, connections and recognition necessary to lead change within organisations at all levels. We are independent and international. We apply the combined expertise of our members to provide evidence and influence decision-making, working towards our vision of transforming the world to sustainability.

www.iema.net