

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

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Response to the Defra consultation into:

Reforming the UK packaging producer responsibility system

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 behaviour 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 on Packaging Producer Responsibility Reform

Reform of the UK Packaging Producer Responsibility system sits at the core of the current set of proposals being consulted on, with the potential to deliver a step change in the sustainable design and management of packaging throughout the supply chain and product life cycle. It has a critical role to play in creating a system that empowers consumers to make choices about the packaging they buy and to be confident in what can and can't be recycled through their council services. In co-ordination with other measures, it will also help to reduce the leakage of waste packaging, particularly plastics, into the natural environment – both land-based and aquatic – through increased and more effective capture of material for recycling.

EPF strongly supports the central tenet of Full Net Cost Recovery, which will ensure that producers take responsibility for the packaging they place on the market and that the cost burden of managing this packaging once it becomes a waste does not rest disproportionately on local authorities and the waste treatment sector. Producers are best placed to ensure that the packaging they place on the market is designed with resource efficiency and recyclability in mind and EPF believes that the application of modulated fees is an appropriate mechanism to incentivise these outcomes.

EPF supports the principles articulated in the consultation and calls for a system that is based on:

- Transparency
- High quality data
- The fair allocation of funding to all parts of the supply chain to support the desired outcomes, including funding for communications and investment in the necessary collection services and reprocessing infrastructure
- Efficiency and accountability throughout the packaging and recycling supply chains
- Robust enforcement and measures to tackle illegal and poor-quality exports of recovered packaging materials, particularly to countries whose environmental standards do not match our own
- A strong focus on improving domestic infrastructure and markets to ensure that the UK can move towards more circular economic practices, reduce its reliance on exports, and stop 'offshoring' waste and its associated environmental impacts.

EPF agrees with the Government's assertion that reform of Packaging Producer Responsibility should form part of a 'coherent system', with measures that 'work together in a way that is understandable and fair for businesses and consumers'. In this context, EPF believes that further consideration and consultation will be needed to ensure alignment between the four sets of proposals currently being consulted on.

EPF remains unconvinced that the Government has given sufficient consideration to the rationale for setting up separate, potentially competing frameworks acting on the same set of waste materials and believes the evidence base is not sufficient to

judge whether this approach will deliver the best economic or environmental outcomes. Further consideration needs to be given to whether the objectives that sit behind the proposals for DRS and the Plastics Packaging Tax could be delivered through a reformed Packaging Producer Responsibility, ensuring a 'whole system' approach which may better lend itself to the principles set out above.

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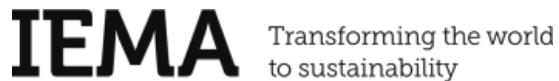
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Notes

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 Licensed 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