

Consultation on EPR for packaging

Introduction

1. What is your name? **Torbay Council**
2. What is your email address? **Waste&recycling@torbay.gov.uk**
3. Which best describes you?

Local government

4. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

Unitary Authority

5. Would you like your response to be confidential?

No

Our approach

Q6. Do you agree with the principles proposed for packaging EPR?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response. Specifically, if you respond No, please identify which principles you do not agree with and explain why.

Torbay Council supports the principles of the proposed packaging EPR and would welcome a move towards a more circular economy. The principals proposed for packaging EPR allow for application of the producer pays principle and facilitate funding for local authority waste and recycling collections, transfer, treatment and disposal of packaging as well as the cost of administering and enforcing the scheme.

Q7. Do you agree with the outcomes that a packaging EPR should contribute to?

(a) Yes

(b) No

(c) I neither agree nor disagree

If you answered No, please state which outcomes you do not agree with.

Whilst the outcomes that are stated in the consultation document are broadly agreeable, Torbay Council does not support a DRS and has responded separately to the DEFRA consultation on DRS.

Q8. Do you think these types of items not currently legally considered as packaging should be in scope of the new packaging EPR system?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

As most local authorities do not offer recycling collection services for these items, the majority of them currently end up in the residual waste stream. There is therefore an opportunity here to either redesign such products for improved recyclability; encourage behaviour change to more reusable items or for producers

to meet the cost of disposal for these difficult to recycle items, allowing for further application of the producer pays principle.

Q9. Which of these two classifications best fits with how your business categorises packaging?

(a) Primary, secondary, tertiary

(b) Consumer-facing and distribution/transit

(c) Neither – please say why, and provide a description of how your business categorises packaging

The classifications described in the consultation document are not used by Torbay Council to categorise packaging. As a Unitary Authority, we are concerned with whether the packaging becomes waste at either a domestic or commercial source. This will affect the way that the packaging waste is collected and also the way that the collections are funded.

When describing waste streams for transfer and treatment, Torbay Council's contractor TOR2 is legally obliged to use the List of Waste classification system.

If there was a move to describe packaging in one of the two ways described, 'Consumer-facing and distribution/transit', would be preferred.

Key Principles

Q10. Do you agree with our definition of full net cost recovery?

(a) Yes

(b) No, it does not fulfil the Polluter Pays Principle

(c) No, it goes beyond the Polluter Pays Principle

Please briefly state the reasons for your response and provide any information to support your view.

There are many aspects to the definition of full net cost recovery that Torbay Council supports. The inclusion of the cost of collection of packaging waste, recycling, litter and fly tipping and the associated transfer and treatment costs is welcomed.

Torbay Council supports the funding of both national and local communications campaigns for packaging waste reduction, recycling and littering reduction.

Torbay Council supports the inclusion of costs related to data recording and feels it is appropriate that this includes local authority costs in relation to using Waste Data Flow.

Whilst we appreciate that the consultation document provides an outline of the broader principles, when defining full net cost recovery it is essential to ensure that all costs are considered. Torbay Council seeks clarity that the following costs have been considered and accounted for;

- Collection cost of packaging within the residual waste stream. We would also question whether landfill tax will be considered as a cost of residual waste

treatment and if a tax on incineration was to be introduced in the future, whether this would be included as part of the net cost calculation.

- The cost of collection from litter bins as well as litter clearance.
- The cost of providing, delivering and replacing containers required to facilitate recycling and residual waste collection of packaging.
- The effect that EPR will have on the cost of existing residual waste treatment contracts. Torbay Council is part of the South West Devon Waste Partnership (SWDWP) which has procured a joint contract for residual waste treatment at a combined heat and power facility in Plymouth. Whilst a reduced tonnage delivered to the facility by the partners would represent an overall saving to the SWDWP, the rate per tonne paid as a gate fee would increase. The pricing of the disposal contract is based upon tonnages that were forecast by the Partnership and the suggested changes (Consistency, EPR & DRS) to local authority waste streams would significantly change these forecasts. The contract runs until 2039 and if a 12% reduction in residual waste delivered to the facility was experienced, this would equate to a saving of approximately £31 million, but as a result of increased gate fees, we would incur an additional cost of £8.4 million, resulting in a net saving of £22.6 million.
- The cost of support services within a local authority which are used to deliver services, but are not a direct cost of the waste collection or disposal function(s) of the authority.
- Operational tasks associated with delivering waste and recycling services and collection of litter. Including cost of management and supervision of collection crews; training; in-cab technology to facilitate more efficient collections; provision of PPE; weighbridge; Cost of complying with Environmental Permits; bulking and transfer.
- The cost to support the waste and recycling and litter collection and disposal services including customer enquiries and complaints; weighbridge tickets and data management; transfer notes; ICT support, finance support.
- Provision of, collection from, transfer and treatment of packaging collected in recycling banks.
- Packaging waste managed at Household Waste Recycling Centres.
- The cost for any additional administrative burden created by EPR, although we accept that at present this is unknown.

Q11. Do you agree that producers should be required to fund the costs of collecting and managing household and household-like packaging waste, i.e. all consumer facing packaging?

(a) Yes

(b) No

(c) I don't know

If No, please briefly state the reasons for your response and state what waste you think full net cost recovery should apply to.

Q12. Do you agree that packaging for commercial/industrial applications should be out of scope for full net cost recovery?

(a) Yes

(b) No

(c) I don't know

If No, please briefly state the reasons for your response.

As a local authority, management of this waste does not usually fall within our remit and we feel that arrangements would be best made between packaging producers and their commercial / industrial consumers.

Q13. We would welcome your views on whether or not producers subject to any DRS should also be obligated under a packaging EPR system for the same packaging items.

(a) Yes they should

(b) No they should not

(c) I don't know

Please briefly state the reasons for your response.

Torbay Council believes that the introduction of a DRS should be delayed and further investigated to ensure that a robust system which has been designed to work in tandem with existing waste and recycling collection services provided through both the public and the private sector from homes and businesses. We believe that this can be done through the careful selection of the materials that are included in a DRS and do not support the range of materials suggested in the consultation document.

Torbay Council would like to see the full net cost recovery of all packaging waste that we manage as a Unitary Authority. It is important to ensure that the cost of managing materials that are not captured by a DRS are included within the full net cost recovery and that however the payment is made (either through DRS or EPR) that the full cost of managing all capture of that packaging in various waste streams is covered.

Driving Better Design of Packaging

Q14. Do you agree with the development of an 'approved list' of recyclable packaging to underpin the setting of either modulated fee rates or deposits?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council would be keen to see that any list developed was robust, transparent and accepted by all stakeholders. The list would need to be regularly reviewed and updated to capture changes in the net cost of managing different materials over time. Regular review would also be essential to ensure that new innovations in both waste management and packaging design could be normalised, or we would have concerns that the list could potentially limit progress in working towards a circular economy.

Torbay Council believes that local government should be represented in the development of any list of 'approved' recyclable packaging, so that the inherent links with the proposals for collection of core materials within the Consistency consultation, can be incorporated into the list and the two can develop together.

Q15. Do you think the payment of modulated fees or the payment of deposits with the prospect of losing some or all of the deposit would be more effective in changing producers' choices towards the use of easy to recycle packaging?

- (a) Modulated fee
- (b) Deposit (for recyclable packaging) and fee (for non-recyclable packaging)
- (c) I don't know / I don't have enough information

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council's view is that both methods of paying fees could help bring about changes in packaging design so that products are easier to recycle. Given that the options are directly linked to a particular governance model, it is difficult to assess them purely on the criteria of promoting product design change.

Q16. Do you think there could be any unintended consequences in terms of packaging design and use arising from:

- (a) Modulated fees
- (b) Deposit (for recyclable packaging) and fee (for non-recyclable packaging)
- (c) I don't know / I don't have enough information

Please briefly state the reasons for your response and provide any information to support your view.

There is scope for abuse of both types of system, in terms of falsifying evidence. The current PRN system is open to and has been subject to, such abuse.

If the deposit system was used producers might end up paying more than required to cover the actual costs of managing packaging through the deposit scheme. The deposit scheme would also be more complex and difficult to administer.

Q17. Do you agree that the deposit approach should be designed to incentivise more closed loop recycling?

- (a) Yes
- (b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

If closed loop recycling was given a value by the deposit scheme then this would help to increase the income received for materials used within closed loop recycling.

Obligated Producers

Q18. What do you consider to be the most appropriate approach to a single point of compliance, the Brand-owner or the Seller approach?

(a) Brand-owner

(b) Seller

(c) Other

(d) I don't support moving to a single point of compliance

Please briefly state the reasons for your response and provide any information to support your view.

This will help to ensure that the aim of influencing product design will be most likely to be achieved, as the brand owner will have more influence over product design than the seller.

It also ensures that the changes needed are influenced from the bottom up and assurance of where the compliance needs to be monitored from are clear so that the audit trail is easily traceable.

Q19. If a single point of compliance approach was adopted, do you think the de-minimis should be:

(a) Replaced with a lower turnover threshold?

(b) Retained and wholesalers and direct-to-retail sellers take on the obligation of those below the threshold?

(c) Other, please state

(d) Don't know

Please briefly state the reasons for your response and provide any information to support your view.

This will help to ensure the inclusion of all packaging materials in EPR, without directly placing the burden of compliance onto small businesses.

Q20. Should small cafés and restaurants selling takeaway food and drinks whose packaging is disposed 'on the go' be exempt from being obligated?

(a) Yes

(b) No

(c) Don't know

Please briefly state the reasons for your response and provide any information to support your view.

Within Torbay many of these types of establishments cause littering through their business activity. Their trading can also result in heavy use of litter bins in some areas. This means that additional resources need to be used in the clearance of litter

and more frequent emptying of litter bins. For example, in Torquay the night time economy has a litter problem associated with small takeaways and there are also litter problems when beaches are used heavily in good weather and many people use the independent businesses at the beach.

The inclusion of small cafes and restaurants in EPR will help to ensure that the true cost of managing the waste generated by these premises is recovered and will allow for further application of the producer pays principle. By ensuring that the owners of these businesses are obligated, they will be more likely to provide recycling facilities, helping better on-the-go recycling infrastructure to be developed.

Q21. If shared responsibility is retained, is Option A or Option B preferable for including smaller businesses or the packaging they handle in the system?

(a) Option A (Lower or remove the de-minimis)

(b) Option B (De-minimis threshold remains as is and obligations extended to distributors of packaging or packaged products)

(c) Other, please state

(d) I don't know

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council would prefer to see a single point of compliance, but if shared responsibility was to be retained then option B seems to deliver changes in packaging design.

Q22. If you have stated a preference for A, do you think the de-minimis threshold should:

(a) Be reduced (please state your suggested threshold)

(b) Be removed entirely

Please briefly state the reasons for your response and provide any information to support your view.

N/A

Q23. Overall, do you have a preference for maintaining a shared responsibility compliance approach, or moving to a single point of compliance?

(a) Shared responsibility

(b) Single point of compliance

Please briefly state the reasons for your response and provide any information to support your view.

A single point of compliance will help to ensure compliance by all and will help to avoid free riding. There is also scope for a single point of compliance scheme to drive change in packaging design, more quickly than a shared system would.

Q24. Do you have a preference for how small businesses could comply?

(a) Pay a flat fee to include a contribution to a communications fund

(b) Apply an allocation formula

(c) Other, please describe

Please briefly state the reasons for your response and provide any information to support your view.

An allocation formula would help to provide incentive to reduce and /or change packaging. It also means that the fee paid would be relative to the size of the business.

Q25. Do you think that requiring operators of online marketplaces to take the legal responsibility for the packaging on products for which they facilitate the import would be effective in capturing more of the packaging that is brought into the UK through ecommerce sales?

(a) Yes

(b) No

(c) Other, please suggest options

Please briefly state the reasons for your response and provide any information to support your view.

It will be easier to manage compliance with a smaller number of businesses than it would to manage compliance of users of the marketplaces, although we would question how this could be enforced.

The packaging generated by the business activity of these marketplaces is currently present within the waste and recycling managed by local authorities, for which they are currently bearing the cost.

Over the last ten years the amount of cardboard collected for recycling in Torbay has significantly increased as more and more people shop online. In 2010-11, 1,794.91 tonnes were collected from household sources, by 2017-18 this increased to 3,712.77. This has caused problems with the sizing of the compartments on the collection vehicles used to collect recycling and has increased the number of journeys required to empty the vehicles, increasing the cost of collection. This is a problem that is exacerbated at Christmas and has contributed towards operational issues resulting in unreliable recycling collection services within Torbay, following Christmas.

Supporting Improved Collections Infrastructure

Q26. Do you agree payments to local authorities for collecting and managing household packaging waste should be based on:

(a) provision of collection services that meet any minimum standard requirements (by nation);

(b) quantity and quality of target packaging materials collected for recycling;

(c) cost of managing household packaging waste in residual waste

Please briefly state the reasons for your response and provide any information to support your view.

(a) NO

Torbay Council believes that local authorities should receive payments for the packaging that they manage as a fundamental principle of an EPR scheme. We

do not believe that this should be dependent on minimum service standards and we do not believe that service standards should differ between different nations within the United Kingdom. Torbay Council does not wish to be put in a position where minimum service standards could have the perverse effect of payments being withheld if a local authority is unable to meet the service standards for genuine reasons.

(b) YES

Torbay Council believes that quantity of materials collected for recycling should form part of the basis of payments. However, if quality was to be included local authorities would be at risk of being penalised in terms of withheld payments. For local authorities, quality issues often arise due to consumers making incorrect choices when recycling waste. Torbay Council believes that the cost of communicating with consumers to help ensure that material quality is maximised, is part of the cost of managing packaging waste and should be treated as such.

(c) YES

It will be important to ensure that this is based on true costs. There are significant differences in the cost of managing residual waste at both regional and even local levels and these differences need to be captured within the payments to ensure transparency. It will also be essential to ensure that the composition of residual waste is known so that a fair and transparent recovery of costs can be obtained. This will change over time, which needs to be considered.

Q27. Do you think we have considered all of the costs to local authorities of managing packaging waste?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council seeks clarity that the following costs have been considered and accounted for;

- Collection cost of packaging within the residual waste stream. We would also question whether landfill tax will be considered as a cost of residual waste treatment and if a tax on incineration was to be introduced in the future, whether this would be included as part of the net cost calculation.
- The cost of collection from litter bins as well as litter clearance.
- The cost of providing, delivering and replacing containers required to facilitate recycling residual waste collection of packaging.
- The effect that EPR will have on the cost of existing residual waste treatment contracts. Torbay Council is part of the South West Devon Waste Partnership

(SWDWP) which has procured a joint contract for residual waste treatment at a combined heat and power facility in Plymouth. Whilst a reduced tonnage delivered to the facility by the partners would represent an overall saving to the SWDWP, the rate per tonne paid as a gate fee would increase. The pricing of the disposal contract is based upon tonnages that were forecast by the Partnership and the suggested changes (Consistency, EPR & DRS) to local authority waste streams would significantly change these forecasts. The contract runs until 2039 and if a 12% reduction in residual waste delivered to the facility was experienced, this would equate to a saving of approximately £31 million, but as a result of increased gate fees, we would incur an additional cost of £8.4 million, resulting in a net saving of £22.6 million.

- The cost of support services within a local authority which are used to deliver services, but are not a direct cost of the waste collection or disposal function(s) of the authority.
- Operational tasks associated with delivering waste and recycling services and collection of litter. Including cost of management and supervision of collection crews; training; in-cab technology to facilitate more efficient collections; provision of PPE; weighbridge; Cost of complying with Environmental Permits; bulking and transfer.
- The cost to support the waste and recycling and litter collection and disposal services including customer enquiries and complaints; weighbridge tickets and data management; transfer notes; ICT support, finance support.
- Provision of, collection from, transfer and treatment of packaging collected in recycling banks.
- Packaging waste managed at Household Waste Recycling Centres.
- The cost for any additional administrative burden created by EPR, although we accept that at present this is unknown.

Q28. Do you agree with our approach to making payments for the collection of household-like packaging waste for recycling?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

A true net cost recovery is required in the same way that it is for household waste and recycling. This needs to account for the geographical locations of businesses as this has a massive effect on collection costs.

It will be important to ensure that recycling collection companies pass on the producer payment element of the service to the customer, so that recycling is incentivised.

Q29. Should businesses producing household-like packaging receive a payment for the costs of household-like packaging waste in residual waste?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

If a payment was received by these businesses then there would not be a fiscal mechanism to incentivise recycling within businesses. It might be possible to use the payment to subsidise recycling services to act as a further incentive. Or instead of passing the payment on, the money could be used to stimulate greater levels of recycling within these types of businesses.

Q30. Are there other factors, including unintended consequences that should be considered in determining payments to:

(a) Local authorities? Please explain the reasons for your response and provide any information to support your view

The effect that EPR will have on the cost of existing residual waste treatment contracts. Torbay Council is part of the South West Devon Waste Partnership (SWDWP) which has procured a joint contract for residual waste treatment at a combined heat and power facility in Plymouth. Whilst a reduced tonnage delivered to the facility by the partners would represent an overall saving to the SWDWP, the rate per tonne paid as a gate fee would increase. The pricing of the disposal contract is based upon tonnages that were forecast by the Partnership and the suggested changes (Consistency, EPR & DRS) to local authority waste streams would significantly change these forecasts. The contract runs until 2039 and if a 12% reduction in residual waste delivered to the facility was experienced, this would equate to a saving of approximately £31 million, but as a result of increased gate fees, we would incur an additional cost of £8.4 million, resulting in a net saving of £22.6 million.

The material markets and how the fluctuations will be captured by the EPR system. At present material prices represent a huge risk to many local authorities / waste collection contractors.

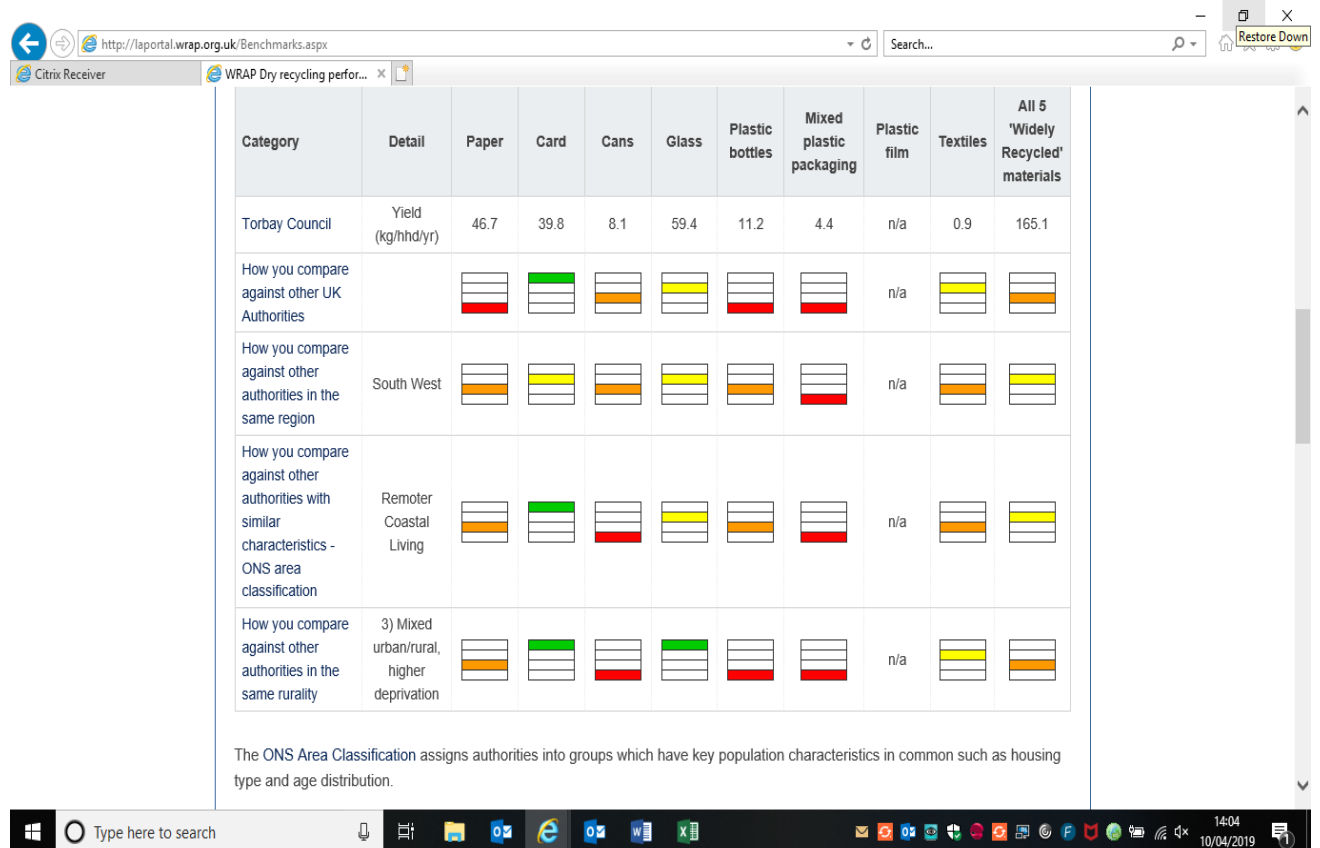
Where local authorities use a contractor for waste and recycling collection services, how it can be ensured that the contractor passes on the producer payments to local authorities in a fully transparent way.

Torbay Council shares LARAC's concerns about the use of the reference cost that the consultation document refers to, which may become used as a ceiling for funding to local authorities. This would be against the principle of full net cost recovery.

Torbay Council believes that this has been over simplified. Although socio-demographics are central to recycling performance, there are many other factors which can affect performance. Two authorities with very similar characteristics can perform very differently in terms of recycling performance. Factors such as local communications, materials

collected, how the materials are collected (kerbside sort or comingled) housing stock (space and design) can all affect recycling performance and these factors aren't accounted for in the formula above.

When comparing Torbay's recycling performance against other local authorities with similar socio-demographic characteristics, significant differences can be seen. Using the WRAP Local Authority Portal <http://laportal.wrap.org.uk> the following differences in recycling performance can be observed.



The Local Authority Portal also provides benchmarking data regarding local authorities in the same 'rurality' as Torbay. Due to the huge differences in performance of authorities in the same rurality as Torbay (Mixed Urban/Rural, higher deprivation), we do not believe that this would be a suitable factor to base payments upon.

http://aportal.wrap.org.uk/Benchmarks.aspx

WRAP Dry recycling perfor...

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Kerbside material-specific recycling and residual performance 2016/17 - Rurality - Rurality 3 (Mixed Urban/Rural, higher deprivation)

	Paper (kg/hh/yr)	Card (kg/hh/yr)	Cans (kg/hh/yr)	Glass (kg/hh/yr)	Plastic bottles (kg/hh/yr)	Mixed plastic packaging (kg/hh/yr)	Textiles (kg/hh/yr)	All 5 'Widely Recycled' materials (kg/hh/yr)	Household Residual Waste collected at kerbside (kg/hh/yr)
Minimum*	20.2	5.5	4.9	3.8	6.2	3.2	0.0	92.3	642.6
Lower quartile	42.0	24.1	8.3	43.0	11.5	4.9	0.5	140.3	489.3
Median	63.9	28.5	9.6	49.5	13.7	5.4	0.8	167.9	453.7
Upper quartile	83.8	33.4	11.4	57.7	15.7	6.2	1.0	187.2	398.7
Maximum	101.7	52.4	17.0	88.9	24.2	9.6	3.5	231.3	219.4
Count	73	73	73	65	72	53	16	64	73

Quartiles for residual benchmark tables have been reversed in comparison to those for recycling so that a local authority appears in the upper quartile if their yield is in the bottom 25% of all authorities in the comparison group. This recognises the reduction in residual waste produced as an indicator of performance.

*As values are rounded to the nearest 1 decimal place, minimum values of 0.0 may occur.

The location / region of a local authority within the country also needs to be considered. For example, there are less recycling facilities and infrastructure within the South West (especially Devon and Cornwall), meaning that local authorities and their contractors need to haul materials further to the reprocessors, resulting in increased costs.

Torbay Council also has concerns about the use of formulas / methods of calculation that are not specific to the local authority. There is fear that if a funding formula was used then this might leave Torbay Council with a budget deficit. This was the case when a formula was applied for bus passes

How will an efficient service be defined and if a service is considered to be inefficient how will this be addressed? We believe that if a service is identified as inefficient then measures should be taken to support that local authority in developing their service to run efficiently, taking into account local factors which may affect efficiency, rather than for the local authority to be penalised through withheld / ceiling payments.

It is essential that geographical differences which impact on the cost of waste and recycling and its efficiency are fully taken into account, to allow for true full net cost recovery.

- (b) For the collection and recycling of household-like packaging waste? Please explain the reasons for your response and provide any information to support your view.

How to ensure that producer payments are passed on and used to incentivise sustainable waste management within businesses producing household-like waste.

Q31. Do you have any information that would help us to establish the costs incurred by local authorities and other organisations of cleaning up littered and fly-tipped packaging items?

Torbay Council's litter collection costs are dictated by our contract with TOR2 and there is no separate identification of the cost of managing packaging as opposed to other types of waste. There is no local evidence to demonstrate what percentage of litter or fly tipping is made up of bottles and cans, so this is difficult to estimate.

Based on the February 2018 WRAP Cymru study 'The Composition of Litter in Wales', which looks at litter collected through a variety of methods including litter bins, recycling on-the-go bins and street sweeping, dense plastic, including plastic bottles and plastic tubs and trays accounted for 16.4% and ferrous and non-ferrous metals including cans made up 11.6% of the litter sampled. However, there is no indication of the percentage of these materials that are packaging.

In Torbay during 2017-18, 1081 tonnes of litter were collected from litter bins and through street sweeping. Using the figures from the WRAP Wales study, this suggests a potential annual arising of 177 tonnes of dense plastics and 125 tonnes of metal. However, only a percentage of this would be packaging.

Torbay Council believes that further work is required to look at the composition of litter and fly tipping, collected through all methods (street sweeping, litter bins, recycling on the go bins) and to provide data regarding the cost of management of littered and fly-tipped packaging waste. The cost of this research should be borne by packaging producers allowing for further application of the producer pays principle.

In 2013 the street cleansing budget was cut by £128,000 in Torbay and the services rationalised. The number of sites of litter and dog waste bins was reduced and the frequency that areas outside of the town centres were swept, both mechanically and manually, was reduced. The chewing gum removal service ceased and the frequency of hot washing was reduced. This was a result of austerity and was completed to achieve a balanced budget.

Q32. How do you think producer fees could be used to improve the management of packaging waste generated on-the-go?

The fees should be used to establish a national network of on-the-go litter provision, which offers consistent services to avoid consumer confusion.

Communication and education should be funded by the producer fees to encourage behaviour change outside of the home and to tackle issues with contamination of on-the-go recycling bins, which currently leads to much of the litter collected for recycling to be disposed of instead. This should be focussed at both national and local levels.

Research should be funded so that the composition of litter and on-the-go packaging waste can be better understood and the correct materials targeted.

Ultimately the producer fees should be used to encourage behaviour change and incentivise consumers not to use single use products. For example, across Devon the 'Refill Devon' project encourages the use of refillable water bottles and has established a network of establishments which offer free refills of water bottles, to try to reduce the number of single-use plastic bottles that are generated on-the-go.

Q33. Do you have any information that would help us to establish the costs of collection and disposal of increased on-the-go provision?

Torbay Council does not have any separate information on the cost of the on-the-go recycling provision. Torbay Council's litter collection costs are dictated by our contract with TOR2 and there is no separate identification of the cost of on-the-go recycling provision.

Where facilities are provided, there are problems with contamination, which means that the material is commonly disposed of rather than recycled.

We believe that further research is required to develop a strategy for on-the-go recycling provision and we believe that this should be funded by EPR.

Q34. Do you agree that provision for the take back of single-use disposable cups for recycling should continue to be developed a voluntary basis by business prior to a government decision on whether disposable cups are included under an EPR scheme or DRS?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

It is important to make sure that these cups are captured under EPR or DRS. Torbay Council would prefer that disposable cups were covered by a DRS, as these are often used on-the-go and are not often collected using local authority recycling services.

Q35. Do you think the recycling of single-use disposable cups would be better managed through a DRS or EPR scheme?

(a) DRS

(b) EPR

(c) Both

(d) None of these options

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council would prefer that disposable cups were covered by a DRS, as these are often used on-the-go and are not often collected using local authority recycling services. It is important to ensure that the cost of managing any cups that arise in the residual waste stream are included in full net cost recovery (EPR).

The success of the plastic bag tax in the UK should be built upon with different materials, such as disposable cups, to drive behaviour change. Additional legislation in line with the plastic bag tax would ensure that this was achieved quickly and would almost completely eradicate their use. Offering better incentives to reuse cups will also massively improve the situation whilst also reducing on-the-go littering and reduce litter bin arising's, which ultimately are either landfilled or incinerated.

Q36. Do you think a recycling target should be set for single-use disposable cups?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

We do not believe that a specific target is required and that if the methods suggested in question 35 were used to encourage recycling and behaviour change, this would work to achieve high levels of waste minimisation and recycling.

Communication and education would encourage behaviour change, so that more people would choose to use reusable cups and if a tax was introduced similar to the plastic bag tax, this would drive waste minimisation of disposable cups.

The management and reporting would be too onerous.

Helping Consumers do the right thing – communications and labelling

Q37. Should producer fees be used to support local service related communications delivered by local authorities?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Local, service related communications are part of the cost of managing packaging waste and recycling. It has been proven that communications and education are effective at encouraging behaviour change and driving higher levels of recycling. In order to use a waste and recycling service effectively, people need to be able to understand how to use it and locally specific communications are essential for this.

Communication and education are also effective ways of tackling issues with quality of materials. If consumers are able to separate their waste properly for recycling this has a direct effect on improving the quality of materials collected.

Any funding to support local communications should be delivered as a specific grant and ring fenced for local waste communications, to allow for transparency.

Q38. Should producer fees be used to support nationally-led communications campaigns in each nation?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

We believe that national communications effectively support local communications and help to drive behaviour change and higher levels of recycling. The campaign materials currently provided by WRAP are invaluable to local authorities and help to ensure consistent messages regarding recycling across the country. We would be keen for the government to commit to the further development of the national communication resources.

In some circumstances, where materials are appropriate to be the focus of waste minimisation rather than recycling (eg. Disposable cups), the need for communication would be reduced as the use of the items decreased. Legislation to force such changes would be required as has been evidenced by the plastic bags tax.

Q39. Are there any circumstances where producers should be exempt from contributing to the cost of communications campaigns?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response. Where available, please share evidence to support your view.

If producers are making packaging, they should be responsible for the cost of communications to ensure that their consumers know how to manage the packaging when it becomes waste.

Q40. Do you agree it should be mandatory for producers to label their packaging as Recyclable/Not Recyclable?

a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

At present on-pack recycling information is confusing to the consumer and can be misleading. Everything can be recycled where facilities exist and there are currently different messages being communicated to consumers depending on their location in the country.

Labelling needs to be clear and unambiguous and the recyclability of packaging should be linked to the core consistency materials identified for collection at the kerbside.

We support LARAC's view that OPRL should be taken forward as the mandatory label for recycling in the UK as it is already well recognised by customers, is widely backed and used by the retail and packaging industry.

Q41. Do you think that the percentage of recycled content should be stated on product packaging?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council believes that the most important message to be present on packaging is about whether the item can or cannot be recycled. We are unclear about whether its inclusion would encourage people to change their purchasing choices and are concerned that additional messages, including recycled content percentage could cause confusion.

Q42. If you responded yes to the previous question, how could recycled content information be provided to consumers? Please describe briefly.

N/A

Q43. Do you have any other proposals for a labelling system? Please describe briefly.

As a local authority we support WRAP and LARAC's work on developing OPRL.

Q44. Do you have experience to suggest an appropriate lead-in time for businesses to incorporate any mandatory labelling requirements?

No.

Q45. In your view, are the estimates made in the Material Flow reports for packaging waste arising the best available data?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your responses and provide any information to support your view.

Although we believe that the estimates made in the material flows may be the best available data, we believe that further work is required to establish robust and reliable data for packaging waste. If future policy is to be based on this data then we do not believe that it is adequate and would like to see further research to develop data in this area.

Q46. Are you aware of any other factors which may affect the estimates of packaging waste entering the waste stream?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your responses and provide any information to support your view.

Torbay Council supports LARAC's view that with regards to the alternative methodology to packaging reporting outlined on page 62 of the consultation, it should be noted that contamination, including process loss, is reported consistently by local authorities in Waste Data Flow as a result of the recently updated question 100.

Material flows must be clearly evidenced. There may be concerns about sample size and frequency which can be allayed by implementing and enforcing a consistent sampling regime, similar to that introduced through the MRF Code of Practice. Even a limited sample size is preferable to theoretical modelling based on "variations in the weight data for individual packaging items used to calculate total packaging."

Q47. In your view, are there other factors which may affect the amounts of obligated tonnage reported?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your responses and provide any information to support your view.

Q48. Do you agree with the packaging waste recycling targets proposed for 2025?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.

The targets are ambitious and we would question the assumption that an additional 4-5% increase would come from consistent collections. These materials are already collected by local authorities, so uplifts of 4-5% in 2025 and up to 12% (steel) by 2030 are unrealistic unless there are significant changes in consumer behaviour and participation in recycling. As EPR and Consistency are not due to be introduced until 2023, the timescale to meet these targets may be too short.

For local authorities, targets are useful and can help to drive service improvements and higher levels of recycling, but the targets need to be realistic and take into account local characteristics which may affect performance in that area.

Q49. Do you agree with the packaging waste recycling targets proposed for 2030?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.

See comments for question 48.

Q50. Please provide your views on the policies and actions that could help us achieve an even higher overall packaging recycling rate, for example 75%, as well as your views on the costs associated with doing so.

- Restriction on residual waste in terms of frequency or container size, supported by a comprehensive and frequent recycling collection. Moving to a three or four weekly residual waste collection has resulted in reduced amounts of residual waste being collected (-15% in East Devon) and the amount of material collected for recycling increase significantly. Although much resource is moved from the collection of residual waste to the collection of recycling, there are cost savings to be realised in terms of reduced number of collections and savings on disposal costs. Material income will also increase as a result of recycling more.

Torbay Council has been considering options for residual waste collection in the future. Consultants White Young Green were commissioned to complete a study of the best potential recycling collection vehicles for Torbay and as part of this study, they state that a decrease in residual waste of 14% is typical where a three weekly residual waste collection is introduced. An increase of 45% in food waste and 9% in recycling yields is typical for authorities that move to three weekly collections of residual waste. This is based upon trials completed in Somerset.

- Campaigns to encourage behaviour change and increase participation in recycling.
- Compulsory recycling, supported by a robust enforcement regime, to be used in situations where education and communication have failed.
- Direct charging for the collection of household waste. Evidence from other countries shows that this is a massive driver for behaviour change.

Q51. Do you foresee any issues with obtaining and managing nation specific data?

(a) Yes

(b) No

(c) Don't know

Please briefly state the reasons for your responses and provide any information to support your view.

Waste Data Flow shows that it is possible for complete and robust data to be provided. This will also be simplified as more waste data is held electronically.

Q52. Should a proportion of each material target be met by "closed loop" recycling, e.g. as is the case for glass recycling targets?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your responses and provide any information to support your view.

We would not want to see secondary materials lose their market value by being used to create lower value products. The additional costs of collection and sorting that may be incurred to deliver material for a closed loop application would need to be covered if closed markets are more costly to provide material for.

Q53. Should government set specific targets for individual formats of composite packaging?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

If yes, what key categories of composite packaging should be considered?

Please briefly state the reasons for your responses and provide any information to support your view.

Whilst targets for individual formats of composite packaging may help to improve sorting and recycling infrastructure for these products, we would prefer to see a DRS used to stimulate recycling infrastructure for items that are more difficult to recycle or that have underdeveloped infrastructure for its recycling and that are not commonly collected at the kerbside.

Q54. Do you agree with the proposed interim targets for 2021 and 2022 set out in Table 6?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.

We believe that the targets may be too ambitious as changes are not due to be introduced until 2023.

Q55. Do you agree with the proposal to increase the allocation method percentage to 35% for 2021 and 2022?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your responses and provide any information to support your view.

Governance Arrangements

Q56. Overall, which governance model for packaging EPR do you prefer?

(a) Model 1

(b) Model 2

(c) Model 3

(d) Model 4

Please briefly explain your preference.

Model 2 allows local authorities to deal with only one organisation, so there will be no procurement or contracting issues and therefore offers a degree of simplicity and clarity which would be beneficial to local authorities.

The model reduces the need to issue evidence, which is a current failing of the PRN system. Central registration and reporting to one organisation will help to ensure transparency and reduce free-riding and will simplify enforcement.

Provides certainty to local authorities that funding for their services will be available and there will be no preferential treatment of local authorities depending on their location.

Torbay Council is keen to see local authorities represented in the governance arrangements.

Q57. If you had to modify any of the models in any way to make them better suited to achieve the principles and outcomes government has set for packaging EPR what changes would you suggest?

Whilst Torbay Council prefers Model 2, whichever model is chosen we are keen to see the following principles working within that model;

- Avoidance of evidence stockpiling and profiteering, as has been witnessed under the current system.
- Concept of full net cost recovery must be central to the model and should ensure that contributions are adequate to cover full net cost recovery.
- Where evidence is required in order for payments to be made this must be simple and transparent.
- Model should not introduce a burden to local authorities, especially if this is not included in full net cost recovery.
- Timing of payments – it is essential that local authorities receive payments as quickly as possible.
- Producer payments must be adequate to deliver full net cost recovery.
- Model must be able to allow for export of waste for recycling.

Q58. Do you have any concerns about the feasibility of implementing any of the proposed governance models?

a) Yes

b) No

c) If yes, please provide specific reasons and supporting information for each governance models that you have concerns about.

Model 1 – this would require more resources for local authorities to manage due to the need to renew contracts with the bidding compliance scheme. We have found that due to the higher costs of managing WEEE in a rural area, there have been issues with attracting a WEEE compliance scheme.

Model 3 – For local authorities this would result in duplication of contact due to the need to deal with waste from businesses and waste from households separately.

Model 4 – Potential payment mechanisms and cash flows appear to be complicated compared to other models. Model 4 also refers to producers needing to pay more than full net cost. Model 4 is not proven and is not currently in operation in another country, making it un-proven and a greater risk for the UK to implement.

Q59. Do you think that any of the governance models better enable a UK-wide approach to packaging producer responsibility to be maintained whilst respecting devolved responsibilities?

Model 2 as one single central body would be able to have a strategic oversight which can benefit the UK as a whole.

Q60. Stakeholders have suggested that a compliance fee mechanism similar to the arrangements currently in place under the WEEE producer responsibility scheme should be introduced if a competitive evidence market continues to operate such as in Model 1. Do you agree?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council does not support the use of Model 1. The fact that the WEEE compliance scheme is not currently meeting the targets set and producers are having to pay top up fees suggests that the model for the WEEE system is not suitable to be applied to EPR.

If a similar model to that used for WEEE was used, Torbay Council would be looking for assurances that all local authorities would be partnered with a compliance scheme and that none were left unrepresented and unable to benefit from full net cost recovery.

Q61. Should a Packaging Advisory Board be established to oversee the functioning of the EPR system and the compliance schemes in the competitive compliance scheme model 1 or do you think other arrangements should be put in place?

(a) Packaging Advisory Board

(b) Other – please provide details

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council does not support Model 1 and believes that a Packaging Advisory Board would add to the complexity of this model. As a result of EPR the UK needs guided and considered plans for developing infrastructure. A strategic oversight from one organisation is more likely to provide this.

Q62. Please let us know your thoughts as to whether the proposed single management organisation should be established on a not-for-profit basis or as a government Arm's Length Organisation.

Torbay Council does not have strong views on this, but is keen to see a transparent and accountable organisation, with representation of all stakeholders, including local authorities.

Q63. If such a management organisation is established as not-for-profit, one option is for government to invite proposals from potential operators and then issue a licence to operate for a defined period of time. Do you agree with this approach?

(a) Yes

(b) No

(c) If no, would you like to suggest an alternative approach?

Providing that the requirements of the scheme are clearly defined and an appropriate analysis of the bids was completed. The length of the licence period would need to be carefully considered in order for it to be long enough for strategic decisions to be made. The organisation would need to be independent from the main stakeholders of EPR.

Q64. Should a single scheme be established for household/household-like packaging and C&I packaging as described for model 2?

(a) Yes

(b) No

(c) I don't know / I don't have enough information

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council supports Model 2 and believes that it should be used to ensure compliance across all sectors.

Q65. Or, should there be a separate system for managing compliance for household/household-like packaging and C&I packaging as described for model 3?

(a) Yes

(b) No

(c) If yes: could model 3 work as described? Or would additional mechanisms be required to make this approach work effectively, please indicate what these might be?

(d) If no: do you have suggestions on an alternative approach?

Torbay Council does not support Model 3 and believes that Model 2 should be used.

Q66. Under model 4 are producers more likely to?

(a) Manage their own compliance?

(b) Join a compliance scheme?

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council does not support Model 4.

Responsible management of packaging waste domestically and globally

Q67. Do you agree that government should seek to ensure export of packaging waste is undertaken in a transparent and environmentally responsible manner?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

To ensure sustainable waste management and legal compliance. Communication is required to build confidence in exported waste and what happens to it when it leaves the country.

Q68. Do you agree that measures identified here would help ensure the export of packaging waste is undertaken in a transparent and environmentally responsible manner?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

Providing that adequate resources are made available for regulators, the measures will improve compliance with legal exportation requirements and will help to ensure reliable export markets for materials.

Q69. Have we missed potential measures that you believe need to be considered alongside those measures we have proposed?

(a) Yes

(b) No

(c) If yes, please explain which potential measures should be considered.

Q70. Do you have any concerns about the feasibility and / or costs of implementing any of the proposed measures?

(a) Yes

(b) No

(c) If yes, please provide specific reasons and supporting information for each measure that you have concerns about.

With regard to measure ten (10) and the sorting and cleaning of packaging before reprocessing and/or export, we would be concerned about the additional cost burden that might be placed on local authorities to facilitate this. We are also concerned that this might not always be required and would prefer to see this as a requirement only if it was necessary.

A more transparent system

Q71. Do you agree that accredited reprocessors and exporters should be required to report their financial information?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view. If you answered no, how would you suggest transparency is provided on how income from the sale of evidence has been used to support capacity building?

As transparency is one of the main issues with the current PRN system, this needs to be tackled as part of an EPR system.

It will be important to make sure that the information requested is of sufficient detail to be able to ensure transparency. High level accounts may not be adequate for this.

Q72. Should accredited reprocessors and exporters be required to generate evidence for every tonne of packaging waste that they process?

a) Yes

b) No

c) I don't know

Please briefly state the reasons for your response and provide any information to support your view.

This will help to ensure that EPR is auditable and transparent and local authorities have to account for every ton of waste that comes under their control via Waste Data Flow so why should this not the case for reprocessors.

Q73. Should accredited reprocessors and exporters be required to report on the packaging waste they handle monthly?

a) Yes

b) No

c) I don't know

Please briefly state the reasons for your response and provide any information to support your view.

Timely data will help to smooth out market conditions if there is to be a market element to the model chosen.

Q74. Do you think that any additional measures to those already described would be required to ensure transparent operating of the evidence market in model 4?

(a) Yes

(b) No

(c) I don't know

If yes, please provide details

Torbay Council does not support Model 4 due to concerns about the way that the current PRN system operates and the similarities between Model 4 and the current PRN system.

Q75. Are there any additional requirements that should be placed on compliance schemes to ensure greater transparency of their operations and reporting?

(a) Yes

(b) No

(c) I don't know

If Yes, please briefly state the reasons for your response and provide any information to support your view.

Torbay Council supports Model 2, which does not require compliance schemes.

Q76. Under a reformed system do you think compliance schemes should continue to be approved by the existing regulators or do you think a different approach is required?

(a) Yes, approved as now

(b) Other, please explain

However the EPR scheme is regulated, sufficient resources are required to ensure its full and thorough regulation.

Q77. Are there any additional requirements of a single producer organisation to ensure transparency of its operation and reporting?

(a) Yes

(b) No

(c) I don't know

If yes, please briefly state the reasons for your response and provide any information to support your view.

Further work is required to develop a potential single producer organisation. Local authorities should be represented in the governance arrangements.

Q78. Do you think there is a need to make more information on packaging available to consumers?

a) Yes

b) No

Please briefly state the reasons for your response and provide any information to support your view.

Information on packaging needs to be easy to understand and not contradictory or misleading. The correct information in a place that is trusted and reliable could help to inform purchasing habits and to drive behaviour change.

This information would be best provided at a National level rather than locally for consistency.

Compliance Monitoring and Enforcement

Q79. Are there other datasets that will be required in order to monitor producers in any of the proposed models?

(a) Yes

(b) No

If yes please explain which datasets will be needed.

As EPR is only in the early stages of development in the UK it will be important to remain open minded about whether further data sets are required.

As a local authority data appears to be missing particularly surrounding litter composition and the percentage of this that is packaging. Further information is also required about where packaging is captured (eg litter bin, litter clearance, mechanical sweeping, recycling banks, HWRCs, kerbside recycling, kerbside residual waste). Information about the composition of residual waste sent for disposal will also be important so that true net cost recovery can be achieved.

Q80. Is there a specific material, packaging type or industry sector whereby producing accurate data is an issue?

(a) Yes

(b) No

If yes, please provide further information on where producing accurate data may be an issue.

N/A

Q81. Do you think a single database, as opposed to the current range of methodologies available, would be an effective alternative?

(a) Yes

(b) No

Please briefly state the reasons for your response and provide any information to support your view.

This would be a simple and straight-forward system which will offer clarity and transparency to all stakeholders, which should help to ensure greater confidence in it. It will also help to ensure a consistent application and calculation of obligations.

Q82. Do you agree that compliance schemes (models 1 and 3), the producer management organisation (model 2) or the scheme administrator (model 4) should be responsible for carrying out audits of producers, which should be reportable to the regulators?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

This will help to ensure transparency and prevention of fraud. However if a compliance scheme was to be auditing its own members this could be seen as a conflict of interests. To combat this, the regulator could review a sample of audits.

Q83. Do you support the broadening of legally enforceable notices to obtain required information?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

A strong legal framework is needed to enable the regulator to enforce the scheme. All stakeholders will be keen to see a fair and transparent system with all obligated producers contributing towards the cost of managing packaging waste.

Q84. Are there other enforcement mechanisms that should be considered which would be timely and effective to bring producers into compliance, for example in relation to free riders?

a) Yes

b) No

If yes, please explain which other enforcement mechanisms should be considered.

Fines and ultimately prosecution. We would also like regulators to have powers to request information from accountants and suppliers about the financial and business activities of a suspected free-rider.

Q85. Are there any further data that should be required to be collated / collected via compliance schemes or a single management organisation?

Please provide brief details.

N/A

Q86. Do you think a penalty charge, as described, is the correct lever to ensure packaging recycling targets are met?

a) Yes

b) No

c) I don't know

Please briefly state the reasons for your response and provide any information to support your view.

If a penalty was applied, Torbay Council would be keen to see it set at a level that is more expensive than compliance, so that non-compliance based on cost is not viable.

Q87. Should stakeholders other than reprocessors or exporters be able to issue evidence of recycling?

a) Yes

b) No

c) I don't know

Please briefly state the reasons for your response and provide any information to support your view.

Torbay Council supports LARAC's view that the fewer places within the chain that can issue evidence, then the less likelihood there is for unintended consequences or possible attempts to make commercial gains from the EPR system. By leaving the evidence point at the reprocessor / exporter this also means that there will be no need to adjust weights for non-target or rejected materials, which will help to simplify the system and make it more efficient.

Q88. Are there any additional enforcement powers that should be applied to waste sorters, MRFs and transfer stations handling packaging waste?

a) Yes

b) No

If yes, please explain which other enforcement powers should be available.

Q89. Do you agree with the proposed amendments to enforcement powers relating to reprocessors and exporters?

(a) Yes

(b) No

(c) I neither agree nor disagree

Please briefly state the reasons for your response and provide any information to support your view.

Q90. Do you have any evidence to indicate that under any of the proposed governance models the likelihood of waste packaging being imported and claimed as UK packaging waste might increase?

(a) Yes

(b) No

If yes, please provide information on any evidence you have.

Q91. Is the current requirement for a sampling and inspection plan and subsequent auditing by the regulator sufficient to address any misclassification of imported packaging waste?

(a) Yes

(b) No

Please briefly state the reasons for your response and provide any information to support your view.

N/A

Q92. Are there other mechanisms that could be considered that would prevent imported UK packaging waste being claimed as UK packaging waste under the proposed governance models?

a) Yes

b) No

c) If yes, please explain which other mechanisms could prevent imported packaging waste being claimed as UK packaging waste.

Torbay Council supports LARAC's view that a central database similar to question 100 of Waste Data Flow could be used to help the regulator identify anomalies between reporting and evidence of recycling.

Estimated Costs and Benefits

Q93. Do you have any additional data or information that will help us to further assess the costs and benefits (monetised or non-monetised) that these reforms will have?

N/A

Q94. Do you have further comments on the associated Impact Assessment, including the evidence, data and assumptions used? Please be specific.

There is not sufficient detail in the Impact Assessment to be able to comment on this. The Impact Assessment is not meaningful nor detailed enough in the areas that it should be and is not clear enough.

Better information is required on the assumptions underpinning the data and a clearer explanation of how the costs have been built up is required. It is difficult to provide scrutiny and comment on the Impact Assessment in a meaningful way.

Q95. If you have any other views or evidence that you think we should be considering when reforming the packaging waste regulations, which you have not yet shared, please add them here

N/A