

Rt Hon George Eustice MP
Secretary of State for Environment, Food and Rural Affairs
Defra, Seacole Building
2 Marsham Street
London
SW1P 4DF

[An open letter – By email]

1st June 2021

Dear Secretary of State,

Maximising the impact and effectiveness of the packaging reforms

The Environmental Services Association (ESA), its members and those countersigned below remain very supportive of both the ambition and scale of the reforms contained within Defra's *Resources and Waste Strategy (RWS)*, which hold the potential to deliver a more circular economy and support the national pursuit of net-zero carbon emissions.

Funding the collection and treatment of packaging waste from municipal sources and micro-businesses, through a new extended producer responsibility regime, will play an important role if Defra is to achieve its ambitious recycling targets.

In practice, these changes to the funding mechanism will, at least partly, be passed through to consumers, resulting in a £100 average annual increase to household shopping bills. It is therefore critical that any costs within the system are only incurred if they directly drive the desired outcomes.

We are concerned that the payment options for the management of packaging waste arising from businesses currently under consideration in the EPR consultation are not sufficiently developed to be implemented in the proposed timeframes and recommend that a post-consultation work-stream is dedicated to refining workable proposals.

We also believe that focussing first on delivering consistency of collections and EPR for households and micro-businesses is the optimum way to deliver quick recycling performance improvement.

The Government rightly aims to drive up recycling rates from non-domestic settings, but the three options presented for consultation highlight the complexity of achieving this. The current proposals contain many sound principles but attempting to accommodate the plethora of current business arrangements has created some highly complex policy proposals we believe may undermine the objectives of Extended Producer Responsibility. We therefore propose the following:

1. Extend local authorities' household recycling services to include micro-businesses that produce similar types and quantities of waste as households.
2. Establish a dedicated work-stream focused on driving complexity out of payment proposals and explore how the reforms could apply to business waste producers more widely.

Ongoing dialogue between Government and industry is essential to ensuring the RWS reforms' success. The business waste payment system is the most challenging aspect of these reforms and we

look forward to continuing to work with your officials to maximise the quantity and quality of UK recycling, whilst creating green jobs and delivering investment across the country.

This letter is copied to:

- Rebecca Pow MP, Parliamentary Under Secretary of State at Defra
- Chris Preston, Deputy Director Resources and Waste at Defra

Yours sincerely,



Jacob Hayler

Executive Director of the Environmental Services Association (ESA), on behalf of ESA members and those countersigned below.

Tom Giddings, General Manager
Aluminium Packaging Recycling Organisation (Alupro)

Charles Jarrold, Chief Executive
British Printing Industries Federation (BPIFI)

Jon Clark, General Manager
British Printing Industries Federation – Cartons

Graham Backhouse, General Manager
British Printing Industries Federation – Labels

Nadiya Catel-Arutyunova, Sustainability Policy
Adviser
British Retail Consortium (BRC)

Simon Weston, Director of Raw Materials
Confederation of Paper Industries (CPI)

Ian Wright, Chief Executive
Food and Drink Federation (FDF)

Martin Kersh, Executive Director
Food service Packaging Association (FPA)

Paul Vanston, CEO
Industry Council for Packaging and the Environment
(INCPEN)

Robert Fell, Director and Chief Executive
Metal Packaging Manufacturers Association (MPMA)

Dick Searle, Chief Executive
Packaging Federation

Simon Ellin, Chief Executive
Recycling Association