

Key proposals for packaging consultations

Defra has published consultations on Extended Producer Responsibility for Packaging and Introducing a Deposit Return Scheme in England, Wales and Northern Ireland, with a closing date of 4 June 2021.

Key proposals include:

UK Extended Producer Responsibility for Packaging

- Targets: Packaging recycling targets will be set for packaging obligated under EPR and separately for drinks containers within the scope of the deposit return schemes. Proposal for minimum recycling targets for the six packaging materials equating to an overall recycling rate for EPR packaging of 73% by 2030
- Full net costs of managing packaging waste: government intends to progress with the broad scope of full net costs of managing packaging waste
- Obligated producers: proposal for the introduction of a single point of obligation
- Disposable cups: views sought on whether a mandatory cup takeback and recycling requirement should be placed on businesses selling filled disposable paper cups
- Modulated fees: proposal that the fees producers will pay to cover the disposal costs of their packaging should be varied to reflect criteria such as recyclability. The consultation sets out the broad framework within which this system could operate and proposes that it is administered by a Scheme Administrator
- Labelling: Proposal that mandatory recyclability labelling should be introduced on packaging by 2026/2027 at the latest
- Plastic film and flexible packaging: proposal that plastic films and flexibles should be required to be collected for recycling
- Bio-degradable, bio-based and compostable plastic packaging: proposal that this packaging is unlikely to be considered recyclable under packaging EPR and will therefore attract higher fee rates
- Payment for management of packaging waste from households: broad principles are set out underpinning the implementation of payment mechanisms. Proposal that payments should be based on both the tonnages and quality of packaging waste collected and recycled
- Payment for management of packaging waste from businesses: Three different approaches to facilitate payments from packaging producers to businesses are set out, two with a role for compliance schemes and the third with full responsibility placed on a Scheme Administrator
- Payment for management of packaging disposed of in the litter stream: Proposal that producers of commonly littered packaging are made responsible for the costs that are directly attributed to their management
- Scheme Administration and Governance: two broad approaches set out – a single administrator/management organisation and multiple compliance schemes with certain functions undertaken by a Scheme Administrator
- Reprocessors and Exports: proposals for new registration and reporting requirements for reprocessors and exporters of packaging waste
- Monitoring and Enforcement: proposal that the environmental regulators will be the primary regulators with charges to better reflect the costs incurred in their compliance activities

The global network for the materials cycle

- Digital design: Proposal that a split of responsibilities between government and the Scheme Administrator for digital infrastructure

Deposit Return Scheme for England, Wales and Northern Ireland

- Targets: Proposal that there should be an obligation placed on the Deposit Management Organisation to achieve a 90% collection rate after three years from introduction of the scheme
- Governance: Proposal for a Deposit Management Organisation to be responsible for meeting the collection targets set out in legislation and will be appointed via a competitive tender process.
- Financial flows: proposals for the Deposit Management Organisation to be funded via three revenue streams: material revenue, producer registration fees, and unredeemed deposits
- Deposit Level: Proposal that a deposit level is not fixed in legislation
- Return Points: Proposal that all retailers who sell in-scope drinks containers will be obligated to accept returns of in-scope material by hosting a return point
- Online retailers: A selection of approaches for online retailers are set out with views being sought on details of how the deposit return scheme could work for takeaway meal delivery services
- Labelling: Proposal that mandatory labelling be legislated for
- Financially reimbursing local authorities: Three options proposed 'do nothing', allow payments via Extended Producer Responsibility Scheme Administrator or a hybrid option
- Compliance monitoring and enforcement: Proposal that environmental regulators are best placed to be Scheme Regulators with local authorities/Trading Standards to regulate the consumer-facing obligations
- Impact assessment: Looks at three scenarios for the period 2023-2032 – all-in, on-the-go (excluding multipacks and over 750ml in size) or all-in without glass.

IOM3 will also be holding a series of virtual roundtable discussions to hear members' views, debate key issues and inform the IOM3 responses. To contribute to the IOM3 response or find out more information, please contact Rachel.Stonehouse@iom3.org.