

Warwickshire Waste Partnership – 15 June 2010

Defra Waste Management Consultation Responses

Report of the Strategic Director for Environment and Economy on behalf of the Officers Group

Summary

Since the last meeting of the Waste Partnership, Warwickshire County Council has responded to two consultations related to waste management. These consultations were carried out by the Government through the Department for Environment, Food and Rural Affairs (Defra).

This report summarises the consultations, while **Appendix A and B** contain the Warwickshire County Councils responses.

Recommendation

That the Warwickshire Waste Partnership notes the consultation responses.

1. Background

- 1.1 This report and attached appendices contain Warwickshire County Council's response to two consultations which were carried out by the Government through the Department for Environment, Food and Rural Affairs (Defra). Each response is in line with the Warwickshire Municipal Waste Management Strategy, and views expressed by members of the Warwickshire Waste Partnership.

The two consultations relate to waste management:-

- (i) Implementation of the "Packaging Strategy"; and
- (ii) Potential landfill bans;

- 1.1 The closing dates for these consultations were 27 May 2010 and 10 June 2010 respectively.

2. Summary of the Potential Landfill Ban Consultation

- 2.1 The "Consultation on the introduction of restrictions on the landfilling of certain wastes", outlines and examines waste streams which are being considered for

landfill restrictions or bans. The waste streams being considered are paper and card; textiles; metals; wood; food waste; glass and plastics.

- 2.2 Several options are outlined in the consultation, these include doing nothing and relying on current measures such as landfill tax to continue to reduce the amount we landfill; introducing bans on landfilling on their own or accompanied by a requirement for waste to be sorted; introducing a sorting or tougher pre-treatment requirement without a landfill ban; and introducing producer responsibility requirements for certain wastes.
- 2.3 If introduced, the restrictions are expected to have a dramatic impact on waste management practices, by boosting the separate collection, recycling and recovery of waste. It is important, however, that the timescales given to any such bans are sufficient to allow the development of the necessary collection, recycling and treatment infrastructure. As such Defra are also asking for views on lead in times to any ban.
- 2.4 Defra has indicated that at this stage, it has no preferred option with regards to which material(s) will be restricted, although food waste could be a prime candidate, due to the government's vocal support for reducing food waste.
- 2.5 Research into how a landfill ban might work in practice in the UK was published alongside the consultation. The research was carried out by Eunomia and looked at the practicalities of implementing landfill bans in the UK. Landfill bans of biodegradable or recyclable wastes have been found to have successfully worked in many other European countries including Germany and Austria. In most cases a ban has been implemented alongside other measures such as landfill tax and other requirements such as mandatory sorting or treatment of waste. Landfill bans in other countries were implemented over a 2-12 year period.
- 2.6 It is unclear currently how any landfill restrictions would be policed. Detailed proposals on the way bans and other measures will be introduced, who the onus would fall upon and the lead-in times to implement them is to be the subject of a full second-stage consultation.

3. Summary of the Packaging Consultation

- 3.1 The “Implementing the Packaging Strategy: recovery and recycling targets, funding transparency and technical changes” outlines new targets for the recovery and recycling of packaging waste by 2020, alongside options to make the Packaging Waste Recovery Notes (PRN) system more transparent.
- 3.2 The PRN system is part of the Producer Responsibility Obligations (Packaging Waste) Regulations 2007, which oblige producers to pay towards the cost of recycling packaging materials and increase packaging waste recycling rates.
- 3.3 The consultation is split into three main parts which are:-
 - (i) New recovery and recycling targets for packaging waste for 2011-20 for obligated businesses (see table below);

- (ii) Strengthened reporting provisions for accredited exporters and reprocessors, to promote transparency in how producer funding is spent;
- (iii) Technical changes to improve clarity and operation of the regulations.

3.4 The tables below show the proposed targets for businesses and the expected recycling rate that will be achieved. Only businesses which handle more than 50 tonnes of packaging a year and have an annual turnover of over £2 million need to meet the targets in table one.

Table 1 (below) - Proposed business targets 2011-2020, including current 2010 targets (%)

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Paper	69.5	72.0	74.0	76.0	78.0	80.0	82.0	84.0	86.0	88.0	90.0
Glass	81.0	82.0	83.0	84.0	85.0	86.0	87.0	88.0	89.0	90.0	90.0
Aluminium	40.0	43.0	46.0	49.0	52.0	55.0	58.0	61.0	64.0	67.0	70.0
Steel	69.0	71.5	74.0	76.5	79.0	81.5	84.0	86.5	89.0	91.5	94.0
Plastic	29.0	30.0	35.0	40.0	45.0	50.0	55.0	60.0	65.0	70.0	75.0
Wood	22.0	28.0	34.0	40.0	46.0	53.0	59.0	65.0	71.0	74.0	74.0
Overall Recycling	68.1	69.0	69.9	70.8	71.8	72.7	73.6	74.5	75.4	76.4	77.3
Overall Recovery	74.0	75.0	76.0	77.0	78.0	79.0	80.0	81.0	82.0	83.0	84.0

Source: Defra

Table 2 (below) – Showing recycling rates 2011-2020 (%) if business targets in table 1 achieved

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Paper	69.0	70.9	72.8	74.7	76.6	78.5	80.5	82.4	84.3	86.2
Glass	62.9	63.6	64.4	65.2	65.9	66.7	67.5	68.2	69.0	69.0
Aluminium	42.8	45.7	48.7	51.7	54.7	57.7	60.6	63.6	66.6	69.6
Steel	56.9	58.9	60.9	62.8	64.8	66.8	68.8	70.8	72.8	74.8
Plastic	22.8	26.6	30.3	34.1	37.9	41.7	45.5	49.3	53.1	56.9
Wood	26.7	32.4	38.2	43.9	50.6	56.3	62.0	67.8	70.6	70.6
Overall Recycling	59.0	59.7	60.5	61.2	62.0	63.4	65.8	68.1	70.3	71.9
Overall Recovery	64.1	64.9	65.7	66.6	67.4	68.2	69.0	69.8	70.6	71.9

Source: Defra

3.5 Notably, the consultation proposes to set differentiated glass recycling targets depending on how the material is recycled - with similar plans to set sub-targets for plastics from 2013.

3.6 Defra sets out two options regarding the level at which UK business targets should be set for the next 10 years.

- (i) **Option 1** -increasing the UK business targets to achieve an overall 70% packaging recycling rate by 2020, including challenging targets for plastics at 75% and aluminium at 70% (see tables one and two).
- (ii) **Option 2** -continue the current packaging recycling targets which achieved a recycling rate of 61% in 2008.

Option 1 is the Government's preferred option as it is more in line with the Packaging Strategy and will produce a better environmental outcome. Defra is concerned that if targets are not increased further, businesses may perceive they do not need to invest further in recycling.

3.7 The consultation also asks for views on the transparency of producer funding, (PRN revenue), which was identified in the packaging strategy as an important issue for both local authorities and producers. The main issue that the proposals seek to address is the issue that producers are currently unable to report on how the funding they provide is spent, beyond the mere fulfilment of a legal obligation. Similarly, local authorities need better information about financial flows, so they are able to make informed planning decisions, or have informed discussions with their waste contractors. The consultation sets out four main options for improving the transparency of producer funding in detail. These are:-

- (i) Maximising the effectiveness of the current reporting system.
- (ii) Revised categories for reporting PRN/PERN revenue expenditure.
- (iii) Automatic reconciliation of revenue against expenditure.
- (iv) Reports on expenditure in percentage terms for each accredited reprocessor/exporter.

4. Summary of Responses

4.1 The response to the consultation on the implementation of the packaging strategy (**See Appendix B**) outlines Warwickshire's support for increasing the recycling and recovery targets for the packaging industry. It also outlines the need for greater financial support by industry and government if they want local authorities to aid them in reaching their targets.

The response also outlines the need for greater transparency in relation to Packaging Waste Recovery Notes (PRN).

4.2 The response to the consultation on potential landfill bans on certain waste types (**See Appendix A**) outlines the County Council's support for diverting waste away from landfill.

4.3 The proposed response acknowledges that this is a first stage consultation and that a second stage consultation would consider more detailed proposals to evaluate, if any such landfill bans could be introduced in practical terms, and where the onus would be placed in terms of responsibility, accountability and funding.

- 4.4 The proposed response acknowledges that the evidence outlined for potential landfill bans show a potential “net benefit to society”.
- 4.5 The response also outlines that although a blanket requirement to pre-treat any waste at the point of landfill disposal would be the most practical solution for a landfill ban, this has its risks of pushing unsuitable waste, or waste where the net benefit of recycling over incineration is clear into Energy-from Waste (EfW) facilities.
- 4.6 The proposed response also states that it would not be supportive of any requirement to pre-treat waste from household waste sources that is sent to an EfW facility.

Enquiries: about this report should be made to Kitran Eastman - Waste Strategy and Partnership Manager, 01926 - 418064, e-mail kitraneastman@warwickshire.gov.uk

Background Papers

Defra “Consultation on the introduction of restrictions on the landfilling of certain wastes”.

Original consultation document can be found at

<http://www.defra.gov.uk/corporate/consult/packaging-regs/consultation.pdf>

Defra Consultation on “Implementing the Packaging Strategy: recovery and recycling targets, funding transparency and technical changes”.

Original consultation document can be found at

<http://www.defra.gov.uk/corporate/consult/landfill-restrictions/20100318-landfill-restrictions-condoc.pdf>

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7 June 2010

Appendix A

Warwickshire County Council

Consultation Response to Defra for

“Consultation on the introduction of restrictions
on the landfilling of certain wastes”



1. Given the evidence available, do you think there is a case for a landfill ban on these waste type? *(paper and card; textiles; metals; wood; food waste; glass and plastic)*

Yes - Based on the evidence presented due to the net benefit to society,

Warwickshire County Council (WCC) acknowledges that Defra have declared that a second stage consultation would consider more detailed proposals. This second stage would evaluate if any of such landfill bans could be introduced in practical terms, and where the onus would be placed in-terms of responsibility, accountability and funding.

The current set of legislative, regulatory and fiscal policy drivers is taking the management of household waste to a position where 40% to 60% recycling and 95% landfill diversion will be achieved by the majority of local authorities by 2020. Waste Composition Analysis of household waste arisings across England and Wales generally show that Local Authorities are recording food as the main identifiable waste type remaining in the residual waste at around 30% by weight (+/- 5%). However, some textiles (e.g. carpet), dense plastics and wood are often 'hidden' in waste composition analysis as they are often catalogued under miscellaneous combustible materials rather than under their primary material type categories.

WCC considers that food, textiles, dense plastics and wood waste types are proving to be the most challenging for many of local authorities to either collect economically (e.g. food) or divert from landfill as a result of undeveloped infrastructure/end-markets, particularly for 'spoilt/soiled' textiles and wood/chipboard treated with chemicals.

As such, WCC would be particular interested in any proposals put forward to target food, textiles, dense plastics and wood for consideration within a second stage consultation.

2. What would be the practical difficulties and issues in implementing a landfill ban on this waste type? *(paper and card; textiles; metals; wood; food waste; glass and plastic)*

WCC acknowledge that Defra policies designed to manage waste often target 'Household' waste as an entity that can be managed differently from 'Commercial' and 'Industrial' waste and recognise that sometimes the UK's existing approach is "focussed too narrowly on waste collected by local authorities" (paragraph 4.31).

When considering how an accreditation approach may apply to Commercial and Industrial waste collected outside of the municipalities' control, an accreditation scheme has the potential to present a problematic scenario similar to the existing pre-treatment requirement. If we consider that small and medium sized enterprises (SMEs) make up a large proportion of the economy - up to 80% to 90% in some local authority administrative areas (AWM 2009), it is felt that the existing collection, transfer and treatment/disposal arrangements are such that it may not be practicable to operate an accreditation scheme with any confidence.

It may be that a blanket requirement to pre-treat any waste at the point of landfill disposal would be the most practical solution, but this has its risks of pushing unsuitable waste, or waste where the net benefit of recycling over incineration is clear into Energy-from Waste (EfW) facilities. This risk is touched upon in the consultation (paragraph 7.8) but would need exploring in further detail within a second consultation.

WCC would not be supportive of any requirement to pre-treat waste from household waste sources that is sent to an EfW facility, but can see the benefits of applying such a requirement to any commercial sources of waste prior to any treatment via EfW.

On a different matter relating to practical issues surrounding landfill bans, WCC acknowledged Defra's position in that "landfill should be the home of last resort for most wastes" (paragraph 3.2). Whilst WCC agrees with this position, a landfill ban in total would not provide a 'last resort'. However, a last resort may be required in practical terms for a number of reasons, for example:

Should markets for recyclables collapse / fall in demand for secondary materials occur as a result of a world wide economic downturn – it might be considered prudent to put in some form of contingency planning that does not require altering primary or secondary legislation or stipulating a direction from the Secretary of State.

Advanced technologies (e.g. EfW) require planned maintenance but it should be acknowledged that unscheduled shutdowns occur where waste may be diverted to landfill. This potential for this problem may reduce given the recent PFI support for a wider spatial distribution of infrastructure of advanced treatment facilities, but contingency planning (e.g. "de minimis" allowances based on plant capacity, etc) would be considered prudent and easily incorporated into WasteDataFlow reporting for municipal waste.

One final observation is that any landfill bans would need to consider how they would impact upon Local Authorities within a two-tier administrative arrangement that may have several Waste Collection Authorities with different collection strategies. For example,

Within a County, it may be that the Northern area is served by an EfW facility so the need to collect/sort food is not paramount from a landfill ban perspective. However, in the Southern area, perhaps a landfill and anaerobic digestion facility are available. This could potentially lead to Waste Collection Authorities having to adapt their collection strategies to meet the requirements of the infrastructure rather than adopting the best environmental and economic option to meet local expectations. Conversely, it might be the Waste Disposal Authorities that will be looking to Defra for further guidance on how best to use the existing powers of direction to the Waste Collection Authorities as provided for in the Environmental Protection Act 1990 to make best use of this infrastructure.

This would no doubt be resolved through Statutory Municipal Waste Management Strategies but an assessment of the potential for inequitable or perverse outcomes within two-tier authorities should be considered within a second stage consultation.

3. If you support a ban on this type of waste what should the lead-in time be for a ban on this waste type, to allow time for the necessary infrastructure to develop?

WCC agrees in principle at this first consultation stage that 7 to 10 years (paragraph 7.2) is a reasonable timescale to consider and implement any of the four of the options and any/all of the nine proposed waste types.

By 2015, it is considered that the municipal sector waste strategies will be well developed and that the large PFI supported infrastructure projects should be largely operational. This would allow time for a post 2020/LATS reflection/evaluation as to whether or not landfill bans have a significant future role to play. This time frame would seem to be in line with the acknowledgment that "...it is considered England will meet the target without the need for additional measures" (paragraph 4.17) in respect of the Waste Framework Directive requiring 50% target for recycling/reuse.

4. **If you do not support a ban on this waste type, do you think other measures should be used to divert it from landfill and if so what would they be? (Please consider the alternative options listed in paragraphs 7.8 -7.17 and any other possibilities)**

WCC has not identified paper/card as a preferred material that should be subject to a landfill ban (even though it is still a relatively significant part of the residual household waste composition) given that the market value for recycling paper/card is a 'pull' on this waste commodity rather than trying to 'push' it out of the waste stream through landfill bans.

However, WCC is a strong advocator of Producer Responsibility and the prospect of any mandatory producer responsibility agreement (as opposed to a the current voluntary agreement, paragraph 6.7) with the Direct Marketing Association and Periodical Publishers Association to target 'junk-mail; would be well received. WCC does support Option 3: Producer Responsibility as the preferred option for targeting paper/card (paragraph 7.16).

5. **There may be other possible approaches to improve resource efficiency and reduce GHG emissions from this waste type (for example encouraging manufacturers and retailers to move away from using materials that are hard to recover or recycle). We would welcome observations and suggestions for each waste type.**

WCC would welcome any further detailed proposals in the second stage consultation on the rationalisation of the range and type of materials (e.g. reducing the number of available plastic polymers for use in packaging) and the co-fusion of materials (e.g. wood and plastic) that makes it difficult to recycle in post-consumer waste streams.

Textiles might be of particular interest to evaluate the benefits of specifying standards around carpet manufacturing.

6. **In addition to the above we invite comments on the costs and benefits detailed in the Consultation Stage Impact Assessment. In particular we would welcome information/views concerning three issues: (i) the likely impacts of the policy options in light of changes already occurring from existing instruments; (ii) the assumptions on the diversion rates assumed from different policy options; and (iii) the impact of the policy options on the efficiency of recycling markets – whether the unit cost estimates are reasonable and whether the implementation of the options would lower unit costs over time.**

No response.

Appendix B

Warwickshire County Council

Consultation Response to Defra for

“Implementing the Packaging Strategy:
recovery and recycling targets, funding
transparency and technical changes”



Chapter 1

- Q1. In your view, are our projections for waste arisings reasonably accurate? Are you aware of any other factors which may affect the levels of packaging entering the waste stream? Please provide us with as much evidence as possible to support your answer, so we can adjust our figures as necessary.**

Warwickshire County Council (WCC) is not in a position to comment on the figures suggested by industry. WCC has, however, like most other local authorities seen a significant drop in waste arisings over the last 12 months, both in actual tonnages and waste per head. We believe that a factor in this is the reduction in packaging weights, as well as the changing economic circumstances. We would hope that these most recent results which have been returned to government via Wastedataflow, have been taken into account when forecasting packaging waste arising.

- Q2. In your view, are the predictions for obligated tonnage reasonably accurate? Are you aware of any other factors which may affect the levels of obligated tonnage reported? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

Warwickshire County Council (WCC) is not in a position to comment on the figures suggested by industry. If previous assumptions on obligated tonnage, however, have proved to be accurate it would appear to make sense to continue those assumptions.

- Q3. Do you agree with our proposed targets for paper/board, and our analysis of what they are likely to require? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

WCC supports these increased target for paper/board, to match or surpass the best in Europe. There is a need for greater understanding of what other policy instruments these countries have in place that aid and facilitate these high levels of recovery. Therefore understanding whether just setting higher targets under the Packaging Obligation Framework would be enough to enable high levels of recovery to be achieved.

WCC would like to see Defra investigate a mechanism for stretching the targets if those in the early years are quickly achieved.

- Q4. Do you agree with our proposed targets for glass and our analysis of what they are likely to require? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

WCC supports an increased target for glass, however, does feel that the targets do not go far enough when taking into account the stated 600,000 tonnes available from the commercial sector waste streams.

Although glass has a high kg/HH yield the collection of glass in a colour segregate manner can be expensive for local authorities. As stated in paragraph 4.25 the collection method for glass is key and mainly dictates the end usage for the glass. If industry and government wishes for improved sources segregation, to ensure that glass goes to re-melt and not aggregate then greater funding will be required for local authorities.

Given this is producer responsibility legislation local authorities would look to obligated producers to bear the additional financial burden of supplying the container end market. There would also be a concern about the end market capacity for all colours of glass – one of the reasons the aggregate market developed in the first place.

- Q5. Do you agree with our proposed targets for aluminium and our analysis of what they are likely to require? We would also welcome your views on how aluminium in composite applications should be accounted for. Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

WCC supports these increased targets for aluminium, however would like to see a mechanism for stretching the targets if those in the early years are quickly achieved.

In terms of looking at the waste hierarchy the dealing with composite materials in terms of whether they are classed as paper or aluminium is 'end of pipe' thinking. A much better way to address the problem is to adopt a 'start of pipe' viewpoint and find ways to eliminate use of composite materials in packaging or design them in such a way that recovery of them is made very simple.

- Q6. Do you agree with our proposed targets for steel, and our analysis of what they are likely to require? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

WCC supports the increased target for steel, however, believes that there is scope to go even further. These targets they would only result in the capture of only one third of the indicated amount of steel currently in the municipal waste stream. There is a case for increasing the targets in an effort to push obligated companies to engage closely with local authorities to develop and fund systems and communications to extract the steel from the waste stream.

- Q7. Do you agree with our proposed targets for plastic and our analysis of what they are likely to require? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

WCC supports these increased target.

One of the major barriers for local authorities recycling of plastics is large variety of plastics used. This leads to a large amount of public confusion. WCC would like to see the packaging industry working together to limited the number of plastics used, and to work for greater standardise of the types used for different products. This would enable locals authorities to simplify the messages for its collections which would aid increases in participations by the public. In those local authority areas where only plastic "bottles" are accepted, greater support is needed to expand collection to further packaging.

End markets for mixed plastics (and sorting technology) will be key to achieving this target. WCC is aware that the infrastructure is starting to develop but this is one particular area where transparency in the use of PRN revenues to develop infrastructure could make a big difference.

- Q8. Do you agree with our proposed targets for wood and our analysis of what they are likely to require? Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.**

If the proposed targets for wood are increased to 2020 to match the current recycling levels there is no challenge or incentive for change or improvement. A better solution would see targets increase dramatically in the short term to match current recycling levels and then

extend beyond those levels to 2020 to encourage investment in infrastructure and realise greater environmental benefits from greater recovery levels.

Q.9 Do you support government's preferred option of increasing targets between 2010 and 2020?

If you are a packaging producer, or a compliance scheme we would much appreciate your views on the cost assumptions that we have used in the Impact Assessment.

If you are a local authority, a waste management company or a member of the public, we would welcome your views on our analysis of what the proposed targets would mean for you.

The comments above highlight WCCs overall approach to the proposed increase in targets.

High targets mean more focus will be placed on obtaining waste from the municipal waste stream. If improvements in household collections are needed to meet these targets than a clear financial support will be needed. WCC wouldn't want to see financial burdens falling on local authority as a result of these targets given that this is producer responsibility legislation.

A direct funding injection into collection infrastructure as well improved revenues support via the PRNs would enable local authorities' to better plan and forecast. With the current pressure on local authority spending it is vital that these funding streams are available.

Q.10 What do you think are the reasons for the obligated tonnage gap in glass and plastics? What can be done to reduce that gap (and who should do it)?

We cannot comment on the reason for the obligated tonnage gap but would ask whether this presents a case for lowering the de minimus level for those materials where there is a gap. This would bring more companies in to the system that have specific responsibilities for tonnages and so generate more funds to increase material capture.

Q11. Do you support government's proposal to split the glass target in line with end-use and reduce the allowable recycling through aggregates over time? Have you got any data which would make our estimate of total tonnages of glass going to re-melt, aggregate or other end-uses more accurate? If so please provide it with your response.

If you are a local authority, a waste management company or a packaging producer, we would welcome your views on our analysis of what this proposal would mean for you, including the cost assumptions used in our Impact Assessment.

If you are an accredited exporter or re-processor, please give us your views on the likely impact of this proposal on your business

In terms of resource efficiency and ecological foot printing there is a compelling argument and logic for closed loop recycling and restricting the aggregates end market for glass. However, this is then closing off 30% of the current end market capacity and as is highlighted in the consultation document the additional income from the remelt market does not normally cover increased costs of colour separated collection. Due to its weight and density, the issues of collecting/storing/transporting glass separately can be significant to local authorities. Careful thought therefore needs to be given how the potential additional costs of collection or remelt can be passed on to local authorities to ensure any additional financial burden is not shouldered by them.

Currently glass reprocessing can be very geographical limited where as an outlet for glass to aggregates can normally be found locally. The worst case could see local authorities currently undertaking non colour separated collections stop altogether as the aggregate market is closed down, causing future targets to be missed. There is also a need to understand what will replace the glass in the aggregates market and the carbon implications of that as an overall carbon deficit may result, despite more glass going to remelt.

As such to increase source segregation a direct injection into collection infrastructure as well improved revenues support via the PRNs would be needed. With the current pressure on local authority spending it is vital that these funding streams are available.

- Q.12 Do you support government's proposal in principle to split the plastics target? We would welcome views from producers regarding the administrative burden of the proposed change in data collection. If you are a local authority, a waste management company or a member of the public, we would welcome your views on our analysis of what this proposal would mean for you. If you are an accredited exporter or re-processor, please give us your views on the likely impact of this proposal on your business.**

WCC supports the principle of splitting the plastic targets to stimulate the markets for plastics which currently are not viable to collect. As such WCC believes that the best option would be the "hybrid split" outlined in section 6.3. This options would enable local authorities to access the financial impact of expanding the range of plastics collected.

There is a need to be sure that whilst the split might progress and encourage 'underperforming' materials, that it does not result in momentum being lost on other types of plastic. Their targets still need to be set at levels that are challenging and result in an increase in recovery rates

Chapter 2

- Q.13 Do you agree with these proposals? If not, please set out an alternative which you think would work better but achieve the same results. We would welcome your views on the expected benefits and disadvantages set out in this proposal, especially is your business stands to be directly affected by them.**

Yes - WCC would welcome proposals which would make the flow of PRN funding/value transparent. WCC believes that it is currently this lack of transparencies which makes some elements of the waste packaging chain sceptical about their impact. As such potential changes in PRN values are rarely taken into account by local authorities'.

Reporting alone is not enough if what the PRN revenue spend is being used for is not aimed specifically at areas that will increase the overall capacity of and recycling levels for packaging. The areas of spend should be reviewed and if needed restricted to those areas that ensure investment on capacity expansion in undertaken – both in terms of collection and treatment infrastructure.

It is debateable that the proposed reporting requirements will increase the administrative burden given that there is a reporting regime in place already that needs to be complied with. We would not want to see PRN revenue diverted to 'admin' instead of the intended use to increase the UK's ability to meet the packaging targets and increase recovery.

- Q.14 Do you agree with the proposed change in reporting categories? If not, please set out an alternative which you think would work better but achieve the same results. We would welcome your views on the expected benefits and disadvantages set out in this proposal.**

If you are an accredited re-processor/exporter, please give us an estimate, in staff days, of how much longer it would take your business to collate the information in the form requested, compared to what you are having to report now:-

- (a) The first year this came into force (for new reporting categories? For sub-material?)
- (b) Subsequent years (for new reporting categories? For sub-material?)

No response.

- Q.15 Do you agree with the proposal for automatic reconciliation? If not, is there another mechanism which in your view would work better and fulfil same objectives?**

Data collection and reporting needs to be accurate and comprehensive. Any amendments to achieve this are supported. Given the reconciliation process that local authorities must undertake as part of the Waste Data Flow system it does not appear unreasonable to expect private industry to perform a similar function with the National Packaging Waste Database

- Q.16 Do you think any of these options should be pursued, and if so, what are the benefits and costs you think would arise? Are there any other options that would work better and fulfil the same objectives?**

No response.

- Q. 17 Do you think any of these options should be pursued, and if so, what are the benefits and costs you think would arise? Are there any other options that would work better and fulfil the same objectives?**

No response.

Chapter 3

- Q 18 Do you agree with the above technical change being made?**

No response.

- Q.19 Do you agree that packaging sent to offshore oil platforms should form part of the UK's recovery/recycling obligation? If not, please provide details. If you are an obligated packaging company supplying packaging to an offshore platform, we would welcome any cost estimates of this change for your business.**

WCC agrees it should be part of recovery/recycling obligation

- Q.20 Do you agree that the requirement for re-processors and exporters to provide independent audit reports should be removed from the Regulations? If not please give details. If you are an accredited re-processor or exporter, please tell us what savings this would result in for your business.**

No response.

**Q.21 Do you agree with the proposed fee structure for Part Cs
If not, please give details.**

No response.

**Q. 22 Do you agree with the above technical change being made?
If you are a small subsidiary company with a turnover of less than £2million, please tell
us how much time this is likely to save for you per year, and any other savings you
may be able to make.**

No response.

Q.23 Do you agree with the above technical change being made?

No response.