

**ENVIRONMENT AND REGULATORY SERVICES PORTFOLIO HOLDER DECISION –
24 APRIL 2019**

**CONSULTATIONS ON NATIONAL WASTE AND RESOURCES
STRATEGY**

1. INTRODUCTION

- 1.1 In December 2018, the Department for Environment, Food and Rural Affairs (Defra) released a new waste and resources strategy entitled “Our Waste, Our Resources: A Strategy for England.”
- 1.2 The Strategy contains a multitude of new policies which are designed to, among other things, improve sustainable production, reduce waste crime, and increase quantity and quality of recycling.
- 1.3 In February 2019, Government released 4 consultations on some of the specific measures proposed in the Strategy. Council Officers, the Portfolio Holder for Environment and Regulatory Services, and a Member Task & Finish Group have worked together to develop the Council’s response to these important consultations.

2. BACKGROUND

- 2.1 The new waste strategy is the first such document to be developed by Government since 2007. The strategic framework contained in the report is as follows:

Two Overarching Objectives:
<ul style="list-style-type: none">• To maximise the value of resource use; and• To minimise waste and its impact on the environment.
Five Strategic Principles:
<ul style="list-style-type: none">• To provide the incentives, through regulatory or economic instruments if necessary and appropriate, and ensure the infrastructure, information and skills are in place, for people to do the right thing;• To prevent waste from occurring in the first place, and manage it better when it does;• To ensure that those who place on the market products which become waste to take greater responsibility for the costs of disposal – the ‘polluter pays’ principle;• To lead by example, both domestically and internationally; and• To not allow our ambition to be undermined by criminality
Five Strategic Ambitions:
<ul style="list-style-type: none">• To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;• To work towards eliminating food waste to landfill by 2030;• To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;• To double resource productivity¹⁶ by 2050; and• To eliminate avoidable waste of all kinds by 2050.

- 2.2 The Strategy stated that Government would consult on some of the key proposed measures. Accordingly, in February 2019, four consultation documents were released. These are detailed below.

Name	Consultor	Geographical scope	No. Questions	Response by...
Consistency in household and business recycling collections in England	DEFRA	England	66	13 May
Reforming the UK packaging producer responsibility system	DEFRA, plus 3 devolved Govts	UK	95	13 May
Introducing a Deposit Return Scheme	DEFRA, plus Wales and NI Govts	England, Wales and NI	89	13 May
Plastic Packaging Tax	HM Treasury	UK	56	12 May

2.3 All four of these consultations have some relevance to New Forest District Council, and have the potential to significantly impact upon the frontline waste and streetscene services. For example, the “Consistency” consultation could require minimum waste collection service standards which may lead to changes in which materials are collected for recycling, how frequently, and in what containers.

3. DEVELOPING THE NEW FOREST DISTRICT COUNCIL RESPONSES

3.1 At the Cabinet meeting on 6th March 2019, the formation of a Member Task & Finish group was approved. This Member group has met on two occasions, with the Terms of Reference being *“To work with the Portfolio Holder for Environment and Regulatory Services to develop this Council’s response to the Government’s consultation on the National Waste Strategy.”*

3.2 The Member group, comprised of Cllrs Matcham, Blunden, B Andrews, Crisell and Sevier, has focussed its attention on the Government proposals that may potentially have greatest impact upon NFDC services. Alongside this, Council Officers have been engaging with Project Integra (Hampshire’s waste partnership) to develop common responses (where appropriate) on some of the more technical areas within the four consultations. The Council is currently awaiting a consultation response from Project Integra. It is anticipated that the submission of NFDC’s final response will closely align with that of Project Integra, where appropriate.

4. CONCLUSIONS

4.1 Working with Officers the Task and Finish Group as identified in 3.1 has reviewed and agreed draft responses to the key questions from all four of the consultations. Not all questions have been answered, in particular where questions are aimed more at packaging producers, or where we do not have a strong view or opinion.

4.2 The Portfolio Holder for Environment and Regulatory Services, is very appreciative of the work undertaken by the working group and has approved by this decision the draft responses from New Forest District Council, as attached:

- Appendix I - Consistency in household and business recycling collections in England
- Appendix II - Reforming the UK packaging producer responsibility system
- Appendix III - Introducing a Deposit Return Scheme
- Appendix IV - Plastic Packaging Tax

5. FINANCIAL IMPLICATIONS

- 5.1 Some of the policy measures proposed in the consultations could have very significant financial impacts upon the Council. However, the consultation consistency states that *“Any new statutory responsibilities for local government would be subject to an assessment of new burdens and funded as appropriate.”* In addition, the consultation on Packaging Producer Responsibility aims to allow Local Authorities to recover net costs of dealing with packaging, from the packaging producers themselves.
- 5.2 The consultation documents do not give enough detailed information to be clear on the exact implications for the Council. All measures will be subject to further consultation later in 2019/2020, when the financial implications may become clearer.

6. CRIME & DISORDER IMPLICATIONS

- 6.1 There are none.

7. ENVIRONMENTAL IMPLICATIONS

- 7.1 The Council welcomes the opportunity to comment on the proposed National Waste Strategy, and sees this as an opportunity to significantly increase the amount of waste recycled, both locally and nationally.
- 7.2 The Council has some concerns regarding increasing vehicle movements with additional services such as an expanded Garden Waste Collection, and would urge Government to recognise the good work that many of our residents currently undertake by composting their own green waste.

8. EQUALITY & DIVERSITY IMPLICATIONS

- 8.1 Where appropriate, the Council's consultation response has highlighted where new or amended services will need to take account of residents in remote areas or with reduced mobility.

9. RECOMMENDATION

- 9.1 That the draft response to the Government consultations on the National Waste and Resources Strategy, attached as Appendices 1-4 be approved; and
- 9.2 That approval be delegated to the Service Manager for Waste and Transport Manager to submit the final response on behalf of New Forest District Council.

10. PORTFOLIO HOLDER ENDORSEMENT

I have agreed to the recommendation of this report.

CLLR A J HOARE

24 April 2019

Sign:

Date:

For further information contact:

Chris Noble
Service Manager – Waste and Transport
023 8028 5588
chris.noble@nfdc.gov.uk

Background Papers:

Government Resources and Waste
Strategy, and subsequent consultation
documents, all published on www.gov.uk.

Date on which notice given of this Decision – 24 April 2019
Last date for call-in – 1 May 2019

In this document, NFDC's proposed response is shown in blue and underlined

Consultation on consistency in household and business recycling collections in England

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Consultation questions on dry recycling

Proposal 1

Q5 Setting aside the details of *how* it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

- Agree – local authorities **should** be required, to collect a core set of materials
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

Further separation of materials may be more difficult for flats and houses of multiple occupancy. Consideration would need to be given to space for additional containers and dealing with increased contamination. A clear communication strategy would need to be agreed specifically for flats.

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

The Government needs to ensure that the National Planning Policy Framework (NPPF), and any guidance for developers deals with physical issues around bin stores. This also needs to include

the ability of waste vehicles (RCVs, RRVs, etc) to access the facilities easily and safely. If this was also required to make sure that bin stores had enough space, were easily accessible for residents and more inviting, it might help increase recycling in flats and HMOs. Likewise, ensuring that developers allow enough space in flats for residents to be able to store their recycling.

Consideration would need to be given as to whether enforcement measures could be implemented in flats.

Q9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

We do agree that local authorities should be required to collect a core set of materials, this will help stop those who move from one county to another questioning why an item suddenly can/can't be recycled and help reduce the scepticism around recycling which occurs when members of the public relocate and an item is not collected for recycling in the new area. However, we do not feel that this will entirely eradicate contamination, there are items that are put in recycling bins that are not recycled in any part of the county (e.g. nappies and other organic material) and having a core set of recyclables will not stop those who choose not to recycle properly from continuing to contaminate their recycling.

In addition, we'd like to iterate that decisions about which materials to collect, how to collect them, and the type and location of end market, should only be taken after full assessment is made of environmental benefits.

Proposal 2

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start of Consistency	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other materials (please specify)				

Q12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

In recent years measures have been introduced to reduce the use of plastic bags and film. Including this as a core recyclable material goes against these policies and may encourage further use. In addition, plastic film is often contaminated with food, which makes it a problematic material. End markets for post-consumer plastic film are not well developed and are unlikely to be so.

There may be a case for phasing in some materials once there is the infrastructure and markets to support recycling them or it has been shown that there aren't better alternatives.

Q13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Local MRF infrastructure will need to be updated to allow for sorting of these items if they are added to the DMR stream, this will require considerable investment.

A communications campaign will need to ensure that all residents are aware of the new items that can be recycled. This will need to be both a digital campaign and using traditional methods (leaflets, bin stickers etc); utilising the latest communication techniques such as behavioural insights as well as previously used and successful methods.

Depending on the outcome of the consultation and how DMR is required to be collected (commingled or multi-stream) additional bins may need to be purchased, and changes made to RCVs – both of which would require additional funding.

Unless collected separately from other materials at kerbside, cartons can be difficult to separate from other fibre products, creating cross-contamination. Apart from one facility in Yorkshire, there currently doesn't seem to be the infrastructure to support recycling of food and drinks cartons, this may require heavy investment and development of end markets before introducing as core material. We are also aware that only a proportion of the constituent parts of a carton is readily recyclable. As capacity and technology improve, cartons could be added to the core set. Also, if cartons were to be included in a DRS, then we would not see a need for them also to be collected at kerbside.

Q14 Do you have any other comments to make about Proposal 2?

We have indicated that we believe that plastic PTTs should be included in the core set. This is because of the benefits this would bring to householder communication around plastic, and the increased tonnage of recycling that would be collected. However, we would make a very strong reservation that we do not believe that, currently, there are sufficient markets or end users for the entirety of this waste stream. Work carried out by this Council and the Hampshire waste partnership, Project Integra, has found only very limited markets for the stream, with PET trays proving particularly problematic. We are hopeful that, due to the implications of the measures in this consultation along with the EPR and plastic tax measures, this situation will improve. However, in the event that this is not the case, there is a real risk that PTTs collected by LAs would be sent for disposal. This would have both a financial and a reputational impact on local and national government, and greater certainty on end markets would be needed before legislation requiring the compulsory collection of PTTs.

Additionally, it is worth reflecting on resident behaviour. A consistent list of materials can be introduced and 'enforced' by local authorities but getting residents to engage with the subject and put the correct material in the correct bin and take personal responsibility for their own waste needs to form a core part of any changes in policy and approach. A significant investment in communications and behaviour change across the piece is critical. Part of this core approach must also include a focus on waste prevention and reuse, ahead of recycling – in line with the waste hierarchy.

Proposal 3

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

- Yes – but I would also add some (please specify which conditions you believe should be added ...)
- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

The impact of introducing recycling of new core materials should be balanced against the measures that may already exist or could be introduced to reduce the use of the end product. For example PE lined cups and plastics bags.

In addition the impacts of interactions with other proposals (such as EPR, plastics tax) need to be reviewed before new materials are introduced.

Consultation questions on separate food waste collection

Proposal 4

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) services to be changed only as and when contracts allow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) providing free caddy liners to householders for food waste collections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes (if yes please provided further details below)
- No
- Not sure/don't have an opinion

Q20 Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

This authority would be in support of a food waste collection service, however would like to see the more emphasis and resource targeted toward food waste minimisation and the importance of home composting.

We welcome government's statement on pages 27/28, 'Given the additional costs involved in separate food waste collection the government will ensure that local authorities are resourced to meet new costs arising from this policy including upfront transition costs and ongoing operational costs' We would be keen to understand how this would work in practice, especially with ongoing operational costs and the length of time these would be covered for

Currently food waste is mixed with residual waste and taken to the ERF for incineration. Removing food waste from the stream would change the calorific value and could have cost implications for the waste disposal authorities and the contracts (many of which are long term) that are held.

In the New Forest there are areas accessible to free roaming animals. In these areas, food waste caddies could not be left on the kerbside due the risk to the animals. New Forest District Council would have to consider this risk when implementing a food waste collection service. It may be possible to ask residents to leave food caddies inside their gates or cattle grids; however this would lead to more time consuming collections and ultimately greater costs.

Existing flats without proper food disposal mechanisms would not be suitable for separate food waste collections due to the increased risks associated with vermin.

This authority also has a concern about liners. We believe that, in order to encourage high participation, liners should be provided free-of-charge to residents. However, we are aware that many Anaerobic Digestion facilities do not accept compostable liners, because they do not break down in the required period of time. The alternative is that plastic liners are provided, but we have a concern that this would send the wrong message regarding waste reduction and plastic recycling. Govt needs to work with the organic waste industry to devise a solution to this before separate food waste collections become compulsory.

Proposal 5

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

- I am not responding on behalf of a local authority
- Specific financial support (please specify)

- Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)
- Communications support, (e.g. free collateral that can be adapted and used locally)
- Technical support, (e.g. free advice from a consultant about round re-profiling)
- Other (please specify ...)

Q22 Do you have any other comments to make about Proposal 5?

There is currently limited infrastructure for countywide disposal of food waste in Hampshire and the surrounds; this would likely require a significant investment. We would like to see a collaborative approach taken towards the planning of AD facilities especially with regards to location. So that facilities are located in best place to meet the needs of multiple authorities.

Consideration should be given to the rural nature of some local authorities and the additional costs that maybe incurred including further separate collections in these areas. Distance between properties, the need to collect from inside gates and or cattle grids, the distance to travel to tip multiple streams. All add additional logistical issues and cost to the service, often with only a limited benefit in terms of tonnage captured for recycling.

New Forest District Council estimates that a separate food waste collection via standalone vehicles on a weekly basis would cost the authority in the region of £1.8m per annum, and we would need financial support in order to introduce such a service. This cost estimate does not include any bulking, onwards transport, or treatment.

Waste prevention is still higher on the food waste hierarchy than recycling, so it's important that the collection of food waste doesn't encourage higher food wastage and communications campaigns still focus on waste prevention and thereafter putting the food to alternative uses prior to recycling.

Proposal 6

Q23 What are your views on this proposal?

New Forest District Council would like to see a separate food waste collection to encourage higher yields. Garden waste should be collected separately as we would like to see this continue to be a charged-for service. Appropriate food waste processing facilities would need to be developed for this to be viable.

Consultation questions on collecting garden waste

Proposal 7

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) A capacity to 240l (bin or other container eg sack)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q25 Do you have any other comments to make about Proposal 7?

New Forest District Council believes that free garden waste collections would be difficult to implement given the rural nature of the district. Currently residents subscribe to the chargeable service; this ensures that the Council receive valuable income needed to sustain this and other services. New forest District Council estimate that the provision of free garden waste collection service would lead to a loss of the current income of £600k per annum. In addition, this authority is likely to incur additional costs circa £200k in order to expand the collection service across the district.

Providing a chargeable subscription service means that collection crew working time is maximised only visiting properties that are registered to the service. This is key to operational success, when working in rural areas with greater distance between properties. In addition to this the Introduction of free garden waste service may discourage residents from home composting, which will, in affect move this waste down the waste hierarchy. The New Forest is considered a rural area with many households having the space and ability to home compost, this authority would like to a see greater emphasis and resource targeted to educating residents towards this.

The proposal to only provide this free service for the 'the growing season' has the potential to be a confusing message for residents and will ultimately lead to a difficult service to manage both operationally and administratively. If the free garden waste collection is introduced, New Forest District Council would want to be able to charge for additional capacity to ensure we are able to

service our current customers' requirements and maintain some income for the service.

If the ability to charge for garden waste collections is lost, this goes against the polluter pays principle, and means that households with no garden or small gardens, are subsidising households with larger gardens.

Garden waste can be poisonous to live stock and free roaming animals. With a free collection there is an expectation that greater quantities will be left on the kerbside; this is a consideration for this Council.

Consultation questions on separate collection to improve quality

Proposal 8

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No (why ...?)
- Not sure/no opinion/not applicable

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

We estimate that separately collecting dry recycling would be more expensive than our current recycling collection service. In addition to this separation of materials and the provision of multiple containers in some rural areas, especially those with access to free roaming animals and flats, would be difficult to manage in an operational sense and would increase manual handling issues.

In addition the New Forest has a high percentage of elderly residents who may struggle to move several bins from their house to the kerbside. Households without gardens or reasonable outside space, may struggle to store multiple containers. We believe that these logistical challenges, plus the extra effort required on the part of the householder, would reduce participation in recycling collections.

If split pod RCVs are required for collection, if one pod is filled more quickly than the others it will mean tipping a half full lorry. This will increase vehicle movements leading to increased emissions and wear on the road and increased time taken to complete rounds.

Our current route for mixed dry recycling is via a MRF provided by the WDA under contract to Veolia, which currently runs until 2030. Significant investment in waste transfer facilities would be needed to allow for offloading and bulking of separately collected materials.

Consideration would also need to be given around DRS and EPR interactions and the removal of certain material types from household waste as a result of these proposals; with less material coming through kerbside, does the remaining material warrant separate collection and therefore increased service costs. As part of this, kerbside sort could make 'scavenging' of high value items under DRS easier to do – creating unintended consequences for Local Authorities to deal with.

Q28 Do you have any other comments to make about Proposal 8?

New Forest District Council currently collects glass separate from all other recyclable materials. Collecting glass separately from other materials helps maintain overall quality and ensures that material is recycled. We would see this as preferred service in terms of capital costs, operational management and participation from residents.

Due the nature of the area this authority may be required to run a split service. It is important that local authorities have the option vary collection methods within their own service. For example some areas with access to free roaming animals or flats may require a different collection method to more urban areas. Flexibility to make these decisions locally will be key to a successful cost effective service.

We would also like to point out that the measures to create the core list of recyclables, and the improved labelling of packaging items accordingly, should help consumers to take the correct course of action and reduce contamination. Likewise, other proposed measures such as EPR, should help reduce the different types of packaging available to consumers. If contamination is reduced and material quality improves, this negates the need for separate, more expensive collections. We would suggest that the separation of materials is not introduced until the effectiveness of the other measures has been assessed.

Consultation questions on bin colour standardisation

Proposal 9

Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

Q30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

- Phased approach 1 – as and when waste contracts are renewed
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways please specify...

Q31 Do you have any other comments to make about Proposal 9?

Phasing has the potential to cause additional confusion for residents and may take many years if councils are to take full advantage of the lifespan of a serviceable bin. The most effective phase in, would be to create standard bin colours that new services should comply to, with the expectation that existing services should conform as and when waste contracts are renewed. However, this will only be successful if collection methods and subsequent sorting facilities are all working in the same way across the country.

This authority would also question the capability and capacity of current bin manufacturers to

meet the need of all the local authorities if standardised bin colours were introduced.

New Forest District Council agree that standardised bin colours in principle offer many benefits including the option to simplify recycling messages on packaging. However this authority would question the effectiveness of a phased approach and would also suggest that a blanket approach could be a wasteful exercise in itself. On the whole this council do not believe this is key to meeting the recycling targets laid out in the National Waste strategy.

We'd also add that it would be unfortunate if the principal aim of this consultation, namely consistency of recyclables, is undermined by a far less serious issue of the colour of bins. The recyclables prize is far more important at this time, and we recommend focusing attention on achieving that as a priority. With this in mind we would suggest that the same can be achieved by using consistent images and colours on both packaging and bins, perhaps by stickers and consistent clear messages.

DRAFT

Consultation questions on service standards

Proposal 10

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- [Agree – government **should** publish statutory guidance](#)
- Disagree – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

Q33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

- Agree
- Disagree – it should be **more often**
- [Disagree – it should be **less often**](#)
- Not sure/no opinion/not applicable

Q34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week Do you agree or disagree with this proposal?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- [Not sure/no opinion/not applicable](#)

Q35 Do you have any other comments to make about Proposal 10?

To ensure local authorities can 'bed' into initial services changes, any review should not be within 3 years. This will allow residents to adapt to change, communications to take effect and data management and service measurement to be robust.

This authority would welcome measures and collection frequencies that ultimately help reduce residual waste. However statutory guidance should allow for local decision making with regards to residual waste frequency as this may depend on the mix of services being provided and also the quantity and nature of the residual waste.

Consultation questions on communicating about recycling

Proposal 11

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

Q36 Do you have any comments to make about Proposal 11?

Recycling tools produced via WRAP and Recycle Now often offer a confusing message for residents of the New Forest. Blanket messages and images don't always cross authority boundaries easily, especially where the materials and collection methods differ. Consistency in core materials will help this however collection methods may still vary between authorities. It is important that WRAP and Recycle Now consider the intricacies and variety of local authority collections when creating communications.

It is still important to have more on the ground interactions with residents as well as utilising innovative approaches such as behavioural insights to underpin ongoing communications and engagement. Residents respond well to face-to-face engagement with local authority Recycling Officers providing relevant recycling information. We would like to see more funding provided for these localised comms to employ Recycling Officers to engage with the public through door-knocking, local events and schools' visits, on an ongoing basis.

Q37 What information do householders and members of the public need to help them recycle better?

The public need to understand:

- What can be recycled
- Where to put it
- What can't be recycled and why
- How to make better choices
- How to reduce waste

However, behavioural insights-led work undertaken by Hampshire County Council has noted that many residents do not 'see' these more traditional channels eg. leaflets are often thrown away as soon as received. There is a certain amount of recycling fatigue amongst UK households, which means that no amount of traditional comms results in behaviour change. The service changes proposed will allow for fresh comms, some of which will be well received by residents as it will resolve many of their questions around why different areas are able to recycle different materials. A nationwide approach with consistent comms on a large scale could help to bring recycling back on the public agenda.

Proposal 12

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

Q38 Do you agree or disagree with this proposal?

- Agree – government **should** work with local authorities and other stakeholders on this
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

It is important the local authorities are able to provide residents with up to date transparent information. Care must be taken that disclosure of end markets doesn't threaten commercial viability or best available prices for material streams. LAs rely on being able to gain the best value for the recyclate they can as this helps to offset a small proportion of the costs of waste

management. The information is available via Waste Data Flow, which is accessible for anyone; perhaps more could be done to communicate this to the wider public.

Consultation questions on end markets

Proposal 13

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

The Government needs to stimulate recycling markets in the UK so there is a reduced need to ship material to other parts of the world. This should decrease costs, provide a more stable market, and reduce the environmental impact of material streams. Ideally, items should only be collected for recycling if they are being properly recycled in a UK facility, but at the very least only collected if there is a viable end market for the material stream. The Government needs to invest in the infrastructure and technology to allow this to happen and incentivise manufacturers to use the end products from these recycling markets; whilst at the same time reducing the variability of materials on the market that cannot be recycled through this and the other proposals (eg. EPR).

We believe it is in the national interest for the four nations to have National Plans to decrease UK reliance on foreign countries to process the UK's recyclates and waste. To that end, we support the intention of the single not-for-profit body proposed in Model 2 of the EPR consultation having the responsibility to consider and make recommendations on domestic infrastructure that supports the ambitions of the four nations.

Consultation questions on non-binding performance indicators

Proposal 14

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to delivery higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree
- Disagree (why ...?)
- [Not sure/no opinion/not applicable](#)

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree
- Disagree (please expand ...)
- [Not sure/no opinion/not applicable](#)

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

Much of the information discussed in this section (e.g. yields of recycling) are already available through portals such as WDF and WRAP website.

Performance indicators should be grouped according to demographics and features of the individual districts / authorities, particularly relating to yields of garden waste and food waste, for example.

If performance indicators are non-binding and a stick approach is not taken, then an incentive could be applied to targets met /exceeded; otherwise non-binding targets are unlikely to drive the change needed across sector (both domestically and commercially).

It is important to look at both the recycling rate and the residual per household/person, as it helps to show the whole picture of waste arisings and performance.

Consultation questions on alternatives to weight-based metrics

Proposal 15

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

- Reuse – local authorities and businesses should have to report on the number of items diverted to reuse rather than disposed of.
- Greenhouse gas emission impacts
- Carbon based – links recycling to climate change, allows authorities to target materials with a greater carbon saving.

Consultation questions on joint working

Proposal 16

We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

Q47 In what way could greater partnership working between authorities will lead to improved **waste management and higher levels of recycling**?

- [Agree](#)
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?

The key barriers are the differences between authorities:

- [Demographics](#)
- [Rural/urban](#)
- [Different priorities](#)
- [Different budgets and financial pressures](#)
- [Politics \(both Party and inter-authority\)](#)
- [At different starting points \(i.e. some with high recycling rates, some with lower recycling rates\)](#)
- [Some with in-house services, some with contracts](#)
- [At different places in contracts](#)
- [Delivery and funding of other services \(not waste\) which may impact on joint working on waste](#)
- [Differing priorities in two-tier areas](#)

Q49 How might government help overcome these barriers?

- [Different levels of targets such as lower targets for those with gardens because free garden waste collections won't necessarily help them increase their recycling targets. The same goes for local authorities who have greater rural or urban areas, targets will need to reflect these variances with a view that all contribute to an overall UK target](#)
- [Supporting local Members to help deliver VfM for the wider population within a partnership area](#)
- [Recognising and actively supporting waste management as a critical universal service along the same lines as traffic and transport – in terms of funding and other support to be made available.](#)

Q50 Do you have any other comments to make about Proposal 16?

Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17

Q51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

- [Agree](#)
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- [Option 3 mixed dry recycling, separate glass recycling, separate food recycling](#)
- Something else (please expand ...)
- Not sure/no opinion/not applicable

Q53 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons

- [Yes – it should be practicable to segregate waste for recycling in all circumstances](#)
- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- [Not sure/no opinion/not applicable](#)

Q55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

[Some exceptions and exemptions may be needed as a result of both space and financial constraints, particularly for smaller businesses and traders; as noted within the consultation document \(page 57\).](#)

Consideration also needs to be given on the availability of onward treatment facilities for commercial waste and how licenced sites for certain sources and types of waste may/could be adapted to deal with commercially sourced, household-like waste.

New Forest District Council recognises that legislative measures for businesses to separate recycling and food waste will require additional infrastructure within the business waste collection service. Enforcing these changes will also be challenging and consideration needs to be given to this. Who will the enforcement powers fall to? If they fall to LAs, additional resources would be needed as current staffing levels would not allow for this level of intervention. We would be keen to work with our local businesses to help inform and educate them on better legal compliance, waste minimisation and improved recycling. However this would also require additional resources.

Proposal 18

Q56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

- [Agree](#)
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

- [Agree](#)
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

We believe Government needs to do further work on this

Q59 Do you have any views on how we should define 'food-producing' businesses?

We believe Government needs to do further work on this

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- [Not sure/no opinion/not applicable](#)

Q61 Do you have any other comments to make about proposal 18?

Further work needs to be done to ensure that waste food from businesses is entering the food hierarchy at its highest point. Concentrating solely on the collection of food waste for anaerobic

digestion may mean that valuable resources that could be used to feed humans and animals are being lost.

Proposal 19

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

Q62 What are your views on the options proposed to reduced costs?

New Forest District Council currently operates a combined household and business collection service that successfully keeps cost down for both the Council and the micro & small business that are serviced. If the consistency in materials for businesses and householders is uniform, the service could continue to operate as a combined service. Local franchising would also be an interesting proposition for medium to large sized businesses; which has the potential to reduce the number of vehicles on the districts roads.

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Many local authorities provide a trade waste collection service; passing on these changes to the businesses they service will lead to additional cost to local authorities. This authority will need to provide appropriate containers, new communication material, administrative support and educational initiatives to ensure that the businesses are able to comply. There will need to be additional funding to support this work.

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

This authority would like to see consideration and guidance given to businesses in the hospitality/events sector where in some instances guests or visitors may generate the waste but there is no obligation on their part to separate at the point of disposal. This requirement to separate subsequently will require a resource upon the business, or would mean that containers used at point of disposal would need to be standardised and clearly labelled. This may require substantial investment from businesses and to work properly there would need to be some level of consistency either at a district or national level.

Business waste data

Proposal 20

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q66 Do you have any other comment on Proposal 20?

Many medium and small sized businesses may not have the capacity to report on waste and

recycling performance.

This council currently offers a combined household and business waste collections service. In order for this authority to be able to report on recycling performance of business and other organisations, there would need to be significant investment in a system to monitor this and separate these material weights from the household service. This may include chips in bins and on-board weighing.

DRAFT

In this document, NFDC's proposed response is shown in blue and underlined

Consultation on reforming the UK packaging producer responsibility system

Our approach

Principles

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.

We do have a concern that principle 1, regarding how the measures should be understandable and fair, is at risk due to the various potential impacts of options and sub-options across the four consultations currently active. We'd emphasise that as simple a system as possible will be key to ensuring engagement from all stakeholders and the ultimate success of the waste and resources strategy.

We are particularly supportive of principles 2, 4 and 5. To date, Local Authorities have been made responsible for the end-of-life costs for a significant proportion of packaging waste on the market, with no financial support or ability to influence the type or volume of material. The proposed EPR is a positive step forward to look at the system in the round and to deal with fully the financial and environmental impacts of packaging in the UK. Full Net Cost Recovery must ensure that the full costs of an item – from manufacture to disposal - is accounted and provided for from the beginning. This includes ensuring that Local Authorities are resourced to properly deal with the issues and support solutions.

Outcomes - what we are hoping to achieve

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.

Definition of packaging and packaging waste

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.

While a number of the materials listed in the example are primarily used by householders as 'packaging' to help avoid food waste and to store food; they are packaging materials and are also, with the exception of foil (if it's clean), difficult for local authorities to both collect and recycle. One of the stated outcomes of the EPR is to enable "...packaging materials that are difficult to recycle to be reduced or no longer used..."; many of these 'single-use' items fall within this category and should, therefore be included within the scope of the EPR. This would also support the waste hierarchy with prevention ahead of recycling considerations.

Types of packaging and sources of packaging waste

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

We are a WCA and do not classify waste in this way.

Part A: Packaging extended producer responsibility – key principles

1. Full net cost recovery

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.

The definition appears to cover all costs associated with dealing with packaging once it becomes a waste material.

The estimated £818 million annual costs to Local Authorities for the collection and then either recycling or treatment of packaging are not sustainable for the public purse; it is therefore appropriate that fNCR is introduced to alleviate this burden to Local Authorities and more appropriately distribute the funding needed to deal with these material streams. However, the funding must flow back to LAs to ensure that the highest minimum standards possible are delivered and sustained in regards to managing waste. We are pleased to note that treatment and disposal (such as energy recovery) are also included in the proposed fNCR definition.

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.

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.

We have answered "no" to this question, however this response is contingent on DRS including the ability for WCAs to claim unredeemed deposits for materials they collect at kerbside that are obligated under DRS but which have not been taken to a return point by the consumer. If DRS does not allow for this, then WCAs will be collecting some packaging (i.e. that obligated under DRS) without financial recompense from producers. How much of an issue this would be is dependent upon whether a "All In" or "On the Go" DRS is chosen (if at all). In the event of a DRS, there may still be some obligated packaging in WCA residual waste. There would need to be consideration given to how councils could be financially compensated for dealing with this material, particularly WDAs who pay the disposal cost.

DRAFT

2. 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.

We firmly support the view that producers should be incentivised to use recyclable packaging. Where appropriate, this should avoid contradiction with the core materials list discussed in the consistency consultation.

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.

We do not have a strong view on this because both should help drive better packaging choices. However the deposit option does have the added benefit of promoting closed loop recycling.

More detail would be needed on how the varying deposits per material type would be designed. We would also want to see a regular review on material types and deposits (and fees) in order to ensure that producers and local authorities (for example) are neither out of pocket nor not paying full net costs for materials.

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.

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.

Closed loop recycling should deliver better environmental outcomes and helps develop a circular economy.
But we recognise it may not always be possible or practical.

DRAFT

3. 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.

If single point compliance is taken forward, it would appear that the brand-owner is best placed to control and influence packaging changes and trends. Brand-owners are also likely to have greater influence over both their supply chains (sourcing) and consumers (marketing and purchasing); again providing them with significant opportunity to deliver positive change.

However, Local Authorities must be involved at this point as well as we have a key role in ensuring that it is not just the brand-owners and sellers driving EPR and how it's delivered.

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.

Our view is the lower threshold, in order to keep the system simple and avoid spreading responsibility further through the supply chain.

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.

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.

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.

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.

Single point of compliance is preferred, in the interest of simplicity. It aligns us with other European EPR schemes, and has the best chance of success in reducing packaging and/or moving to more recyclable packaging.

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.

We would suggest that this approach should also include a multiplier or factor that addresses the material type – in much the same way that the deposit system could work. If the material type is recyclable, the factor is lowered or not included; but if it is non-recyclable, then the factor is included or higher than the deposit would be.

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 e-commerce 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.

We believe that larger online retailers (such as Amazon and Ebay) are in a strong market position to ensure that sellers outside of the UK would have to either comply in ensuring packaging is recyclable or the deposit paid is higher. While the consumer will be paying the higher costs likely to be incurred by producers; ultimately their purchasing power should help to drive changes in the system.

DRAFT

4. Supporting improved collections and 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); No
- (b) quantity and quality of target packaging materials collected for recycling; Yes
- (c) cost of managing household packaging waste in residual waste Yes

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

Difficult to agree to (a) above, before the minimum service standards have been agreed. In our response to the consistency consultation, we have agreed to the proposal on core materials, but do have concerns over end markets and our ability to find/use them. We would be opposed to 100% of EPR payments to LAs being based on meeting the minimum service standards which, due to either local or national issues, cannot be complied with. We would not wish payments to be linked to collection frequency of residual waste.

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.

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.

We do not feel that there is enough detail to make a judgement either way. Our only comment is that payments should have flexibility to account for local circumstances and the actual costs incurred by LAs. There is also no such thing as an 'average' local authority – so the use of averages makes both 'winners' and 'losers' in terms of funding; is this fair?

We have a concern that the suggested 6 categories of rurality on page 47 are insufficient in recognising some of the deeper differences between Local Authorities.

With regard to disposal, there is huge variation in gate fees even within individual regions, and the system for payments needs to be designed to ensure that no LAs are disadvantaged because they

have higher than average gate fees, especially where these are tied into long term contracts.

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.

We have answered no because we'd wish to see businesses strongly incentivised to separate waste for recycling. NFDC runs its own trade waste collection service, but at present the number of recycling customers is far outweighed by the number of residual waste customers.

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

(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.

NFDC does not intend to respond to this question.

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?

No.

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

Producer fees could contribute to the cost of rolling out, and servicing, dual litter/recycling street bins. In our experience, contamination of recycling in these bins can be high, but with limiting the target items to plastic bottles and cans, and using well designed bins, there can be some success.

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

No.

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.

We have indicated in our response to the DRS consultation that we feel coffee cups should be included in a DRS. In the meantime, voluntary schemes would ensure increased capture of these items.

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.

Single-use coffee cups are mostly used On The Go, but to achieve reasonable recycling rates they should come under DRS, which offers an incentive to consumers.

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.

5. 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.

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.

There is a role here for both national communications, and local communications. National communications can deliver general messages about the benefits of recycling, recyclability of different materials, and new national initiatives such as DRS. At local level, more instructive communications are needed to guide residents in terms of their local services and how to participate in them.

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.

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.

One of the major issues facing consumers who are making decisions about what items to recycle, is the confusing labelling (or lack of labelling) on packaging. Standardised and compulsory labelling will help inform consumers, increase participation and reduce contamination.

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.

This will help consumers to understand that the process is circular, and that if they recycle an item it will be put back into packaging. This will help consumers understand their role in the circular economy, and could increase participation in recycling schemes.

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

Please describe briefly.

Clear numbering in an easily-recognised / identifiable graphic that is consistent across all in-scope consumer packaging, and is prominently displayed on the packaging item. This should apply to both locally produced packaging and imports to avoid any confusion.

Alternatively, a traffic light system could also support this objective. Red = not recyclable; Green = Recyclable.

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

Please describe briefly.

NFDC does not intend to respond to this question.

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

NFDC does not intend to respond to this question.

Part B: Packaging waste recycling targets

6. Packaging waste recycling targets to 2030

Q45. In your view, are the estimates made in the Material Flow reports for packaging waste arisings 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.

The consultation document clearly lays out concerns already stated for the data contained within the Flow reports, supported by other evidence bases such as the Eunomia report cited in Appendix D in the Impact Assessment. While we recognise that it is unlikely to be possible to get a complete view on POM tonnages; we would need more assurances on the data and the forecasting it provides. Additionally, the individual reports are of considerable length and the timescales for this consultation do not permit for an in-depth analysis of the information they hold.

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.

The current profile will be subject to the outcomes of all 4 consultations; there is likely to be changes to the overall composition. For example, the impact of cartons being in or out either a DRS or EPR system? May encourage a loophole if they're not in. Additionally, any new polymer or other materials that may come onstream will have an impact.

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.

[We are only able to comment from a Local Authority perspective however. As EPR \(and possibly DRS\) are only due to be implemented from 2023 at the earliest, we have concerns that the 2025 target may not be achievable within the short timescales from implementation and measurement \(given that currently WasteDataFlow validation take 8 months from the end of the financial year for the previous year's data\). We would suggest that targets for 2025 could be indicative.](#)

[We would suggest that regular review of the targets needs to be built into the system. Additionally, no consideration appears to have been made around waste prevention and reuse targets.](#)

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.

[We would agree with the targets, but as for Q48 some form accounting for businesses coming on-stream in regards to consistency and data reporting will need to be accounted for if there is a delay – as these targets are for UK plc. Regular review will be needed.](#)

[We generally support alignment with EU targets. However, if the projected rate for some materials \(e.g. aluminium, 71% by 2030\) is higher than the EU target, we would ask why the target isn't increased to reflect this?](#)

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.

[This series of consultations have overlooked the top of the waste hierarchy – waste prevention ahead of recycling. A proactive rather than a reactive approach would help](#)

achieve the aims of the waste hierarchy and reduce waste arisings in the first place. Likewise, weight-based targets that are non-binding in isolation do not assist either.

Incentivisation/penalisation; taxation of certain materials and approaches or incentivising positive behaviour (such as with a tax break). Legislation around recycled content and mandating certain behaviours. A balanced approach to supply and demand – demand must be created for the more typically hard to recycle materials (e.g. pulp) or the materials need to be driven off the market

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.

Inconsistency of reporting both within and then between the four nations will create issues.

Additionally, commercial data is traditionally very difficult to come by as this is normally protected under 'commercial confidentiality'.

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.

Closed loop recycling is preferable to “downcycling”. However we are not clear on whether a target for all material types would be appropriate or realistic.

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

- (d) Yes
- (e) No
- (f) 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.

Yes, we would like to see materials such as tetra packs and coffee cups treated in this way. Both these items have to be dealt with separately from the “pure” paper/cardboard items, and come with their own challenges in terms of collection, sorting, and processing. Separate targets would recognise these facts.

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.

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.

Part C: Governance arrangements

7. Governance models

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 4 will deliver the best outcome for EPR reform; such as for example the incentivisation to use recyclable packaging. The variable deposit/fee approach is similar to the modulated fee but provides an upfront flow of funding as opposed to that proposed in Models 1 – 3. Additionally, it keeps household and commercial waste together.

The proposal to support closed loop recycling is also welcome. This must be only where it is possible, however. This model places responsibility for ensuring that products are both recyclable in the first place and then recycled firmly with the producers, and we believe that is likely to drive the best outcomes. Additionally, it removes LAs from the vagaries of the material markets; LAs should be reimbursed in full for the services that they provide in collecting and disposal; while not being exposed to the risks of rises and falls within the material markets. We do have a concern over the limited amount of detail on exactly how and on what basis LAs would be reimbursed and would welcome more information on this.

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?

There are elements from Model 2 that we believe could be incorporated into Model 4 to make it a stronger model; this would be the inclusion of a not-for-profit Producer Management Organisation. We would also want to include a regular (at least annually) review of market conditions and LA costs to ensure that deposits are neither too high nor too low – either of which could result in negative consequences and behaviours. We would also want a Local Authority voice on the nfp PMO (such as the LGA perhaps?) to ensure that our interests are as well represented alongside that of Government and Producers.

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 reflects the current PRN and arguably hasn't worked; it creates a whole new market with schemes competing with each other to access the packaging waste stream from Local Authorities. It creates unnecessary competition with market forces at play (see also the WEEE Producer Compliance Scheme). This may be why the current PRN system has been less successful.

Model 3 is likely to cause confusion between household and commercial waste streams. Responsibility sitting with different organisations would be extremely complex to control and could indirectly encourage leakage and/or abuse of unintended loopholes.

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?

Arguably none of them if there's no UK wide approach. There is a need a consistent system otherwise there is potential for loopholes.

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.

Model 1 is similar to the existing PRN system and arguably hasn't encouraged the expected outcomes; it creates a whole new market with schemes competing with each other to access the packaging waste stream from Local Authorities. It creates unnecessary competition with market forces at play.

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.

Either a Packaging Advisory Board or Producer Management Organisation on a not-for-profit basis with a Local Authority seat at the table.

To confirm, we support Model 4.

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.

We support a not-for-profit approach as there is a concern that there is a risk that Local Authorities will not receive said monies if it is not a NFP organisation. WRAP model v Valpak. Additionally, we would want this organisation to be apolitical and therefore separate from Government. We would also wish for Local Authority representation on this body.

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?

We would not wish to see a stagnation of work if the licence is for an overly extended period of time. Perhaps the licence could operate in the same way as a contract for waste collection – say 8-10 years maximum with a clearly defined specification and KPIs?

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.

We would support this approach in Model 4; this is most consistent and should be easier to administer.

- 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?

Project Integra does not support option 3. The inconsistency is a risk and also the potential for abuse. The adopted CEP targets are UK wide, not on an individual sector basis; Model 3 doesn't appear to support this approach.

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.

There is evidence that big waste companies do not use their own compliance schemes for WEEE PCS as it is still more economical for them to use others in a competitive marketplace. Could larger compliance schemes be better regarded by the market as they have a greater stake in delivering?

8. 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.

[The UK has a duty of care to ensure that any materials exported are done so in the most sustainable \(socially, environmentally and economically\) manner possible. We agree that more needs to be done to ensure there is confidence in exported end market processing of materials.](#)

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.

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.

[NFDC does not intend to respond to this question.](#)

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.

NFDC does not intend to respond to this question.

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9. 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?

Transparency of financial systems would help to ensure a more level playing field; however there is a strong likelihood that reprocessors will have a concern over commercial competitiveness and sensitivity – particularly if they are global operators.

The accompanying audit system must be robust and transparent to ensure confidence in the processes.

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.

We would support this from a transparency perspective and to avoid leakage/loopholes within the system. This approach also supports the deposit/fee proposal in Model 4.

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

- a) Yes
- b) No

Minimum quarterly reporting.

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

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.

[Project Integra does not support the compliance scheme approach. Producer compliance schemes may disadvantage those local authorities where it is difficult to achieve certain targets and we do not believe that they necessarily support an effective approach to EPR.](#)

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

[See answer to Q75](#)

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.

[The process/delivery will need to be consistent and transparent, with clear expectations identified and agreed from the beginning.](#)

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.

[Consumers need to understand clearly what can and can't be recycled and why in order to engage. Labelling must be clear and simple and be consistent with other schemes such as consistent collections and DRS.](#)

10. Compliance monitoring and enforcement

Q79. To Q93:

NFDC does not intend to respond to these questions.

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

We understand the logic and principles that are set out and applied within the impact assessment and agree with the approach taken as part of this consultation. However, the impact assessment is based largely on assumptions for which evidence is limited, further research is required and estimates, scaling and predictions which have not been tested.

These variables make it difficult to determine whether the costs are realistic and comparable but more specifically what the effects may be for our area.

It would be helpful to test actual LA data through the impact assessment to check the reasoning and flow of material, data and money against the proposals put forward in the four consultations.

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.

Whilst we broadly supports the proposals put forward in this consultation, we believe that there is a significant gap left by the complete lack of detail on any approach to waste prevention which is the highest priority on the Waste Hierarchy.

Additionally, we would welcome the addition of mattresses as an obligated material under EPR from the beginning. Mattresses are an increasingly difficult and large volume material to deal with and while they may not be strictly defined as packaging, nonetheless they are a product fly-tipped on a regular basis and present unique issues for Local Authorities and Reprocessors that place no obligation on the producers to deal with.

There is a disparity between the rates for packaging recycling and the targets; more clarity on these would be welcome.

In this document, NFDC's proposed response is shown in blue and underlined.

Please note: NFDC is awaiting the Project Integra response to this consultation before finalising responses.

Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Basic principles for a DRS

8. Do you agree with the basic principles for a DRS?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view

A further principle should be that Local Authorities should not be economically disadvantaged by a DRS.

Proposed models for a DRS system

9. Should the following materials be-in scope of a DRS:

a. PET bottles

Yes

No

Neither

I don't know / I don't have enough information

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

b. HDPE bottles

Yes

No

Neither
I don't know / I don't have enough information

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

[If milk bottles are to be excluded from a DRS, there will be very little HDPE beverage bottles in scope anyway, so for clarity maybe it is better to exclude HDPE altogether.](#)

c. Aluminium cans

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

d. Steel cans

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

e. Glass bottles

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

f. Other (please specify)

10. Should the following materials be-in scope of a DRS:

a. Cartons e.g. Tetrapack

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

[NFDC is aware that the carton recycling facility near Halifax is currently the](#)

only option for recycling these items in the UK. If this facility has capacity to reprocess cartons collected through a DRS, then NFDC would be in support of them being included.

b. Pouches and sachets, e.g. for energy gels

Yes

No

Neither

I don't know / I don't have enough information

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

Recycling options for these materials are very limited. These items could be incorporated at a later date as/when recycling options become available.

11. If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?

Yes

No

Neither

I don't know / I don't have enough information

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

12. Should the following drinks be in-scope of a DRS:

a. Water

Yes

No

Neither

I don't know / I don't have enough information

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

b. Soft drinks (excluding juices)

Yes

No

Neither

I don't know / I don't have enough information

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

c. Juices (fruit and vegetable)

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

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d. Alcoholic drinks

Yes (some)

[Yes \(all\)](#)

No

Neither

I don't know / I don't have enough information

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

e. Milk containing drinks

Yes (some)

[Yes \(all\)](#)

No

Neither

I don't know / I don't have enough information

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

f. Plant-based drinks (such as soya, rich almond and oat drinks)

Yes

[No](#)

Neither

I don't know / I don't have enough information

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

g. Milk

Yes

[No](#)

Neither

I don't know / I don't have enough information

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

h. Other (please state which):

13. Do you think disposable cups should be in the scope of a DRS?

- a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

[Yes](#)

No

Neither

or

I don't know / I don't have enough information

- b. Disposable cups made of plastic (such as those used in vending machines) Yes

[No](#)

Neither

or

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The government is particularly interested in any.

[Coffee cups are a significant waste stream in both street litter bins and in littered waste. Due to the nature of their use, the public are reluctant to take them home, and whilst there are options for promoting reusable coffee cups, they are not always practical. Including them in a DRS would therefore be a good step to increasing capture. Collecting coffee cups via a DRS keeps them separate from other recycle \(e.g. other cardboard/paper\) and gives the best chance of successfully recycling them. Enabling coffee cups via DRS means a consistent message can be given about drinks containers.](#)

[Vending machine cups are not usually used "on the go" and therefore there are opportunities for collecting/recycling these cups within offices or other places where they are used. We do not feel a DRS is useful/practical for these cups.](#)

14. Do you agree with the proposed material flows as described above?

Yes

No

[I neither agree nor disagree](#)

I don't know / I don't have enough information

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

[In the absence of any alternative options, or any particular DRS expertise within the Council, the flow seems broadly appropriate but we have one further comment. It seems that the "counting centre" function could be removed by ensuring that return points carry out this function, thereby reducing cost by cutting a stage in the process.](#)

[Further detail may be added here on receipt of Project Integra consultation response.](#)

15. Do you agree with the proposed financial flows as described above?

Yes

No

[I neither agree nor disagree](#)

I don't know / I don't have enough information

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

[In the absence of any alternative options, or any particular DRS expertise within the Council, the flow seems broadly appropriate but we have one further comment. We would like to see the ability for Councils to claim unredeemed deposits on items collected at kerbside or bringsites confirmed within these flows.](#)

[Further detail may be added here on receipt of Project Integra consultation response.](#)

DRAFT

Overlap with the packaging producer responsibility system

16. Should producers obligated under a DRS be:

- a. [Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?](#)
- b. Also obligated under the reformed packaging producer responsibility system for the same packaging items?
- c. Other (please explain)
- d. I don't know/I don't have enough information

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

[Assuming that, via a variable DRS producer fee, producers would be sufficiently incentivised to reduce the amount of "difficult to recycle" materials placed on the market, there doesn't seem to be significant benefit in obligating producers under both DRS and EPR.](#)

17. If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

Deposit Management Organisation (DMO)

18. Do you agree that the DMO should be responsible for meeting high collection targets set by government?

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

19. Should the DMO also be responsible for meeting high recycling targets set by government?

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

20. Should unredeemed deposits be used to part-fund the costs of the DRS system?

Yes

[No](#)

Neither

I don't know / I don't have enough information

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

[The DRS system costs should be wholly met by sale of material income and producer contributions. Please also see comments under question 22](#)

21. If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

[These deposits should be used by Government to support national communications and behaviour change campaigns, infrastructure development or research and development in the area of waste/resources. Please see comments under question 22](#)

22. Do you have alternative suggestions for where unredeemed deposits could be allocated?

[Local authorities which collect in-scope items at kerbside, bringsites, or HWRCs, should be able to claim the unredeemed deposits on these items, to help cover cost of collection/sorting etc, as this cost may not be in scope for EPR.](#)
[Any other unredeemed deposits could be passed to Govt as per our response to Q21.](#)

23. If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:

- a. Industry (drinks producers)? [Yes](#)
- b. Government [Yes](#)
- c. Trade associations representing those hosting return points (e.g. retailers,

- small shops, transport hubs)? [Yes](#)
- d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)? [Yes](#)
- e. Other (please specify) – [waste management industry?](#)

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

24. Should there be government involvement in the set-up/running of the DMO body?

- Yes
- No
- Neither
- [I don't know / I don't have enough information](#)

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

25. Do you agree with the government's proposals that a DMO would:

- a. Advise government on the setting of the deposit level/s

- [Yes](#)
- No
- I neither agree nor disagree
- I don't know / I don't have enough information

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

- b. Set producer/importer fees

- [Yes](#)
- No
- I neither agree nor disagree
- I don't know / I don't have enough information

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

- c. Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers

- [Yes](#)
- No
- I neither agree nor disagree
- I don't know / I don't have enough information

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

d. Set and distribute the handling fees for return points

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

e. Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

DRAFT

- f. Be responsible for maintenance of reverse vending machines (RVMs) and provision of bags/containers to those running manual return points

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

- g. Own the material returned by consumers

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

- h. Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

- i. Fund counting sorting/centres – and manage the contracts for counting/sorting centres

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

- j. Be legally responsible for meeting the high collection targets set by government for drinks containers within scope of the DRS.

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

k. Measure and report recycling rates to government

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

l. Run communications campaigns to aid consumer understanding of the DRS

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

[Further detail on all of question 25 may be added here on receipt of Project Integra consultation response.](#)

Producers

26. Do you agree with our proposed definition of a producer?

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

27. Should there be a de minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?

Yes

No

Neither

[I don't know / I don't have enough information](#)

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

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28. Should a de minimis be based on:

- a. Number of employees
 - i. If yes, how many employees?
- b. Sales figures
 - ii. If yes, what figure?
- c. Volume/weight of drinks put on the market
 - iii. If yes, what volume/weight?
- d. None of these
- e. Other

[Further detail may be added here on receipt of Project Integra consultation response.](#)

29. If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?

[Further detail may be added here on receipt of Project Integra consultation response.](#)

30. In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO? Do you agree with this proposal?

[Yes](#)

No

I neither agree nor disagree

I don't know / I don't have enough information

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

31. Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMs and an IT system?

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

Operational costs

32. Should producers of drinks within a DRS be responsible for DRS operational costs?

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

Retailers / return provisions

33. Which of the following should be obligated to host a return point?

- a. Retailers who sell drinks containers in scope [Yes](#)
- b. Transport hubs [Yes](#)
- c. Leisure centres [Yes](#)
- d. Event venues [Yes](#)
- e. None of these
- f. Other (please specify)

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

[If the DRS is to be successful, then the maximum possible number of return points is needed, to maximise capture and ensure that returning items is convenient for consumers.](#)

[Consideration should be given to implications on temporary events – festivals, shows, community events etc.](#)

[The locations above are very generic and would need further definition in legislation.](#)

34. What might the impacts be on those hosting:

(a) Reverse vending machines? Where available, please share evidence to support your view.

[Space – has a location got sufficient space for such a machine? In the case of a leisure centre, such a machine would need to be located on the external side of entrance barriers, where space is limited.](#)

[Security – will machine be secure to prevent theft?](#)

(b) Manual return points? Where available, please share evidence to support your view.

[Space – has a location got sufficient space for storage of containers returned manually? How will returned items be stored safely prior to being collected in bulk? In the case of a](#)

leisure centre, the industry is now moving towards un-staffed reception areas.
Security – where/how will material be stored safely?

35. Are there any Health and Safety-specific implications that may be associated with hosting return points?

There will definitely be security concerns. RVMs must be secure, and material stored at manual return points must be securely stored. At manual points, manual handling becomes an issue.

36. Is there a de minimis level under which businesses who sell drinks in scope should be exempt?

Yes

No

Neither

I don't know / I don't have enough information

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

It seems sensible that very small retailer could be exempt, as they will not contribute to the economies of scale associated with larger locations, and they may not have room to host a return location. However, this could mean that we miss out on return points in rural areas, where locations fall under the de minimis level and are not obliged to provide a return point.

37. Should a de minimis be based on:

- a. Floor size **Yes**
 - i. If yes, what floor size?
- c. Sales figures for drinks in scope
 - ii. If yes, what figure?
- d. Number of employees
 - iii. If yes, how many employees?
- e. None of these
- f. Other (please specify)

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

Available space to host a RVM or manually collected material may be a limiting factor, so floor size seems most sensible.

39. Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers? Please provide details.

Further detail may be added here on receipt of Project Integra consultation response.

40. For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?

Utilising existing LA bring sites for RVMs. Although this would need to consider security and ASB concerns.

Could supermarket home delivery vehicles act as mobile return points?

Or the DMO could provide mobile return points that will visit different areas at set times/days to offer a temporary collection point. The LA could have a role in providing such a facility.

41. What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?

Utilising existing LA bring sites for RVMs. Although this would need to consider security and ASB concerns.

Could supermarket home delivery vehicles act as mobile return points?

Or the DMO could provide mobile return points that will visit different areas at set times/days to offer a temporary collection point. The LA could have a role in providing such a facility.

42. Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?

No

43. Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?

Yes

No

Neither

I don't know / I don't have enough information

Please briefly state the reasons for your response. Where possible, please provide supporting information.

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44. Should there be a de minimis under which online retailers would not be obligated to pick up and refund DRS material?

Yes

No

Neither

[I don't know / I don't have enough information](#)

If yes, should a de minimis for online retailers be based on:

- a. Sales figures for drinks in scope
- b. Number of employees
- c. None of these
- d. Other (please specify)

45. Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.

Yes

No

Neither

[I don't know / I don't have enough information](#)

Please briefly state the reasons for your response. Where possible, please provide supporting information.

46. Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?

[Yes](#)

No

Neither

[I don't know / I don't have enough information](#)

Please briefly state the reasons for your response. Where possible, please provide supporting information.

47. Do you have any further views, comments or evidence in relation to retailers not already covered above?

[Further detail may be added here on receipt of Project Integra consultation response.](#)

On-trade Sales

should think we should consider.

48. How should a DRS account for 'on-trade' sites such as bars and restaurants

[Further detail may be added here on receipt of Project Integra consultation response.](#)

The deposit

49. What do you consider to be the optimum deposit level to incentivise return of drinks containers?

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

50. Should the deposit level be a flat rate across all drinks containers covered by the DRS?

- Yes
- No
- Neither
- I don't know / I don't have enough information

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

51. Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?

- Yes
- No
- Neither
- I don't know / I don't have enough information

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

[Further detail may be added here on receipt of Project Integra consultation response.](#)

52. How do you think deposits should be redeemed? Please tick all that apply.

- a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points)
- b. Digitally (for example a digital transfer to a smartphone application)
- c. Cash
- d. Return to debit card
- e. Option to donate deposit to charity
- f. Other (please state)
- g. None of the above

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

All of above have their merits, and it is likely that a combination of all of them will be needed to maximise consumer participation in the DRS. It is suggested that the aforementioned consumer research should explore this area.

DRAFT

Sending material on for recycling and data recording

53. Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

54. In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?

[Yes](#)

No

Neither

I don't know / I don't have enough information

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

Transparency

55. How do you think transparent financial flows in a DRS could be achieved most effectively?

Please explain your answer, providing evidence where available.

[Further detail may be added here on receipt of Project Integra consultation response.](#)

Monitoring and enforcement

The DMO

[Further detail may be added to whole of DMO section on receipt of Project Integra consultation response.](#)

56. Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?

If no, why and is there another body that would be better suited to perform this function?

[Yes](#)

No

Neither

I don't know / I don't have enough information

Please explain your answer.

57. How frequently should the DMO be monitored?

(This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))

- a. Annually
- b. Bi-annually
- Other (please specify)

58. How often should producers be checked for compliance with the DRS (if compliance is obligated)?

- a. Annually
- b. Bi-annually
- Other (please specify)

59. Should enforcement focus on:

- a. A sample of producers?
- b. All producers?

60. Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?

Yes

No

Neither

I don't know / I don't have enough information

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

Fraud

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

61. Are there any points in the system which you think would be particularly susceptible to fraud? Please state

62. Which labelling/markings on drinks containers in scope would best protect against fraud?

Please select all that apply:

- a. Deposit value amount
- b. Marking indicating inclusion in DRS
- c. Existing product barcode (containing DRS information when scanned)
- d. Other (please specify)
- e. None of the above

Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems.

63. How could return via reverse vending machines (RVMs) best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.

64. How could the process of manual returns best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.

65. How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?

DRS Options – ‘all-in’ and ‘on-the-go’ ‘All-in’ option

66. Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?

[Yes](#)

No

Neither

I don't know/I don't have enough information

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

Yes, for practicality reasons.

DRAFT

67. If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?

> [3 Litres](#)

> 4 Litres

> 5 Litres

Other

There should be no maximum size cut-off

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

‘On-the-go’ option

68. Do you agree with our definition of ‘on-the-go’ as less than 750mls in size?

[Yes](#)

No

Neither

I don’t know/I don’t have enough information

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

69. Do you agree with our definition of ‘on-the-go’ as excluding multipack containers?

[Yes](#)

No

Neither

I don’t know/ I don’t have enough information

Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of ‘on-the-go’. Where available, please share evidence to support your view

70. Based on the information above, and where relevant with reference to the associated costs and benefits outlined in our [impact assessment](#) (summarised below), which is your preferred DRS option?

All-in

[On-the-go](#)

Neither

I don’t know / I don’t have enough information

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

[We support an on-the-go DRS for the following reasons:](#)

- [We feel that this targets the scheme at commonly littered items, and it should reduce the associated littering.](#)
- [This could also target coffee cups, for which there is no significant alternative.](#)

Collecting coffee cups via a DRS keeps them separate from other recyclate (e.g. other cardboard/paper) and gives the best chance of successfully recycling them. Enabling coffee cups via DRS means a consistent message can be given about drinks containers.

- It could increase capture of on-the-go items for recycling. These are usually “lost” as a resource, via littering or via mixed litter bins.
- Depending on the success (or otherwise) of the smaller scale On The Go option, it could be expanded further to All In at a later date.

We oppose the All In option because:

- This would have a significant impact upon LA kerbside collections.
- We have modelled some of the potential impacts of an All In DRS via the Suez/Anthesis Resource and Waste Policy Impact Calculator (RAWPIC), which shows the following:
 - A 17% reduction in kerbside tonnage
 - A £140k reduction in income from sale of recyclate and recycling credits
- Local councils already provide comprehensive and frequent collections of recyclate from outside consumers’ homes. This will become even more the case following implementation of the Consistency consultation recommendations. Adding a DRS to this existing system seems to be duplicating existing systems, and it could lead to unintended consequences such as more vehicles on the road via consumer journeys.
- As far as we are aware, there are no All In DRSs elsewhere that have been laid over the top of comprehensive existing kerbside systems. Therefore the impact and outcomes are very difficult to quantify.
- We feel that obligating producers under EPR and funding local collections will meet the overall waste strategy aims without introducing competing systems.

We’d like to make four further points:

- Under both options, consideration needs to be given to theft and antisocial behaviour. For example:
 - Around RVMs, especially those located externally
 - Around manual collection points, where collected material is not safely and securely stored.
 - There will always be some obligated material presented at kerbside for collection by LAs, either within residual waste or within recycling. On collection day, this may present an opportunity for individuals to split open bags to obtain the items from inside, which would adversely affect the street scene.
- Whilst the reduction in kerbside material may lead to a reduction in waste disposal costs, reductions in collection costs are likely to be less significant. Our collection vehicles will still be obliged to visit all streets. In the case of our current mixed recycling service, we will still have to visit every property in order to collect paper, card, and any non-obligated plastic and cans. So whilst tonnage may reduce, our costs would not reduce proportionately.
- Both DRSs will lead to a drop in income for us. The consultation document suggests that LAs will have any net costs covered, which is important. One way to soften the blow is to allow LAs to claim unredeemed deposits, as described earlier in this consultation response.
- Before a decision is taken, we’d suggest that a pilot or trial scheme could be useful in testing many of the assumptions in the consultation document and Impact

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Summary of approach to Impact Assessment

71. Do you agree with our impact assessment?

- Yes
- No
- I neither agree nor disagree
- [I don't know / I don't have enough information](#)

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

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

72. Do you think more data is needed? If yes, please state where.

- Yes
- No
- Neither
- [I don't know / I don't have enough information](#)

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

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

73. Are there other costs and benefits which we have not covered in our impact assessment?

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

74. Do you have further comments on our impact assessment? Please be specific.

[The impact assessment assumes that a decrease in litter leads to a proportionate decrease in litterpicking costs. In reality, the reduction in litter is quite small, and would not be significant enough to allow for reduction in cleansing frequencies, staff or vehicles. There could be a saving on litter disposal costs, made by the WDA.](#)

75. The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives? If so please briefly describe it, making reference to any available evidence

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

76. A potential option for introducing a DRS could be to start with the ‘on-the-go’ model, and then expand/phase roll-out to ‘all-in’. Do you think this would be an effective way to introduce a DRS?

Yes

No

I neither agree nor disagree

[I don't know / I don't have enough information](#)

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

[One of the potential advantages of starting with On The Go is the flexibility to expand to All In at a later stage if it can be demonstrated that it is having a positive impact.](#)

Outcomes of what we are hoping to achieve

77. Do you think a DRS would help us to achieve these outcomes? Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

a. Reduction in litter and litter disamenity (include expected % decrease where possible)

[Yes](#)

No

Neither

I don't know / I don't have enough information

[It logically follows that litter would reduce. As explained above \(Q74\), it is questionable whether the reduction would be significant enough to lead to cost savings from litter collections.](#)

b. More recycling of drinks containers in scope of a DRS, especially those disposed of ‘on-the-go’

[Yes](#)

No

Neither

I don't know / I don't have enough information

[Capture/recycling rates of the On The Go items is known to be low, and we would agree that a DRS could increase this, although we have no data to suggest by how much.](#)

c. Higher quality recycling

[Yes](#)

No

Neither
I don't know / I don't have enough information

The nature of return points suggests that the quality of material collected via this route would be high.

d. Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials

Yes

No

I don't know / I don't have enough information

This is a possible outcome, but not a guarantee. For example, a significant number of authorities have collected plastic PTTs for a significant period of time, and yet the reprocessing capacity for PTTs has not grown. Arguably this aim will also be achieved via consistency and EPR.

78. Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?

Yes

No

I neither agree nor disagree

I don't know / I don't have enough information

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

A DRS will certainly achieve at least some of these aims. As expressed earlier, NFDC does have a concern that a DRS system will compete with established kerbside collections. We do see the potential benefits in an On The Go DRS.

Alternative approaches

79. Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?

Yes

No

I neither agree nor disagree

Other (please state)

I don't know / I don't have enough information

Please explain your answer, providing evidence where available.

Increasing the quality and quantity of recyclate are both aims of the accompanying consultations on consistency and EPR, and many of the proposals within those documents will achieve many of the aims of a DRS. The exception to that may be litter reduction, but the forecast reduction in litter is relatively small. Having said that we would support an On The

[Go DRS.](#)

80. Do you think an alternative approach would be a better way of achieving the outcomes?

Yes

No

I neither agree nor disagree

Other (please state)

I don't know / I don't have enough information

Please explain your answer, providing evidence where available.

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

Design of drinks containers

81. How should a DRS drive better design of packaging? Please select all that apply:

- a. Varying producer fees that reflect the environmental cost of the products that producers are placing on the market [Yes](#)
- b. An additional producer fee for producers using unnecessary and/or difficult to recycle packaging [Yes](#)
- c. Other (please specify)
- d. None of the above

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

[Incentivising better design of packaging with recycling in mind should undoubtedly be an aim of a DRS.](#)

82. Who should be involved in informing and advising on the environmental cost of products? Select all that apply

- a. Government
- b. Reprocessors
- c. Producers
- d. Local Authorities
- e. Waste management companies
- f. Other (please specify)

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

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

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DRS and other waste legislation

83. Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?

[Agree](#)

Disagree

Neither agree nor disagree

I don't know / I don't have enough information

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

84. Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS? Please specify.

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

Further comments

In addition to this consultation, we are also carrying out social research with the public and other analytical research to support our evidence base for decision making.

85. Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?

[Further detail may be added to whole of Fraud section on receipt of Project Integra consultation response.](#)

In this document, NFDC's proposed response is shown in blue and underlined

NFDC is only planning on responding to 5 questions within this consultation.

Plastic packaging tax: consultation

NFDC is only planning on responding to 5 questions within this consultation.

- 6 Do you agree with the government's suggested approach to defining plastic in scope of the tax?

Yes, we also agree with the inclusion of bio-plastic and compostable varieties, as we believe the benefits of using alternative plastics such as these are not proven, and we should not promote their use until further research and development has taken place.

- 7 Do you agree with the government's suggested approach to defining packaging and packaging materials in scope of the tax?

Yes. Aligning with the definition of packaging used in Producer Responsibility Regulations promotes simplicity and consistency.

- 10 Do you think alignment with the reformed Packaging Producer Responsibility regulations is important for the purposes of the tax?

Yes – to promote simplicity and consistency.

14. Do you agree with the government's preferred approach of a single threshold, and why? If not, what alternative would be better, and what are the risks associated with this? Please explain your answer and provide any supporting information and evidence.

Yes, we agree with single threshold, but would stress that we would like to see the threshold increase over time, to promote continuous improvement as innovation and technology support greater levels of recycling.

20 Do you agree with the government's suggested approach of setting a flat rate per tonne of a plastic packaging product? Why?

Yes, for purposes of simplicity