

# Consultation on reforming the UK packaging producer responsibility system

## About you

Q1. What is your name?

Councillor EJ Poll

Q2. What is your email address?

*This is optional, but if you enter your email address you will be able to return to edit your consultation response in Citizen Space at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.*

wastestrategy@lincolnshire.gov.uk

Q3. Which best describes you? Please provide the name of the organisation/business you represent and an approximate size/number of staff (where applicable).

(Please tick only one option. If multiple categories apply to you please choose the one which best describes you and which you are representing in your response.) (Required)

- Business representative organisation/trade body
- Packaging designer
- Packaging manufacturer / converter
- Product manufacturer / pack filler
- Distributor
- Retailer
- Waste Management Company
- Reprocessor
- Local government
- Community group
- Non-governmental organisation
- Charity or social enterprise
- Consultancy
- Academic or research
- Individual
- Other
- If you answered 'Other' above, please provide details:

Q4. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

The Lincolnshire Waste Partnership (LWP) brings together the public bodies within Lincolnshire responsible for collection and disposal of waste, including:

- Seven Waste Collection Authorities (WCA's) – Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council, South Kesteven District Council and West Lindsey District Council; and
- One Waste Disposal Authority (WDA) – Lincolnshire County Council.

Q5. Would you like your response to be confidential?

Yes / No

If you answered 'Yes' above, please give your reason:

# 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 agree in principle, but note that funding for local authorities may tie in with meeting "minimum service standards". The exact contents of these standards will be crucial, particularly with regard to:

- Allowing councils the freedom, in line with the localism agenda, to provide services in a way which is most appropriate for their area and giving the best service to their residents, and
- Ensuring that the standards respond to the impacts arising from other policies – e.g. allowing for less frequent collections where food waste collections reduce residual waste.

## 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.

Foil, cling film, jiffy bags, paper cups and sandwich bags are still packaging, and we still need to collect and process them, so they need to be included so that costs can be recovered.

Can we include crisp packets as these often appear as contamination across Lincs districts?

## 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

# 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.

We don't feel we have sufficient information to say for certain at this stage whether or not everything has been included.

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.

The scope should include these because, the wider the scope, the wider the potential impact in terms of behaviour change.

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.

Concerns have been raised about the possibility of double-charging of producers obligated under both systems. However, this should not happen – Our understanding is that the DRS will not fund "full costs" but will simply circulate deposit money to change consumer behaviour.

## 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.

It is vital that this 'approved list' supports and links to the 'core list' that is part of 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 don't understand the two proposed models well enough to express a preference.

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.

We don't understand the two proposed models well enough to express a preference.

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.

Regardless of which approach is used, 'closed loop' recycling is a good thing which should be promoted.

### 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.

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.

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.

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.

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.

## 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);
- (b) quantity and quality of target packaging materials collected for recycling;
- (c) cost of managing household packaging waste in residual waste

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

- Minimum service standards (item a) are not needed provided 'quantity and quality of target packaging materials' are being successfully collected.
- It is important to clarify how these categories relate to the collection requirements already imposed on local authorities under 'TEEP'.

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.

You also need to include any costs of sampling needed to establish the packaging content of each waste stream, particularly residual waste.

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.

There is not enough clarity on how this is proposed to work – e.g. it says "this could..." rather than "this will..."

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.

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

(a) Local authorities? Yes

Please explain the reasons for your response and provide any information to support your view

- It would appear that payments will either be based on onerous and costly regular sampling, or on average figures which, even if accurate initially, will not remain so as circumstances change.
- There needs to be greater clarity on how payments will be allocated/shared between Waste Collection Authorities and Waste Disposal Authorities in 2-tier areas.

(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.

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?

- We do have info on overall costs relating to clean-up of flytipping and littering, but not specifically for packaging. Can Wastedataflow/Flycapture provide anything useful?
- Will these costs be recalculated annually (retrospectively) or be based on estimates/averages?
- However calculated, you need to ensure that these cover the full costs so that they can be appropriately passed through.

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

- Provide funding for wider provision of separate litter bins for different materials.
- Meet servicing costs, ideally the full costs rather than just a contribution.

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

We don't have any information, but it would be helpful to have further clarification of what is considered to be 'on-the-go'. It sounds like on-street bins, but you also mention litter – Does 'on-the go' recycling include cleaned-up litter?

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.

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.

EPR gives greater incentive to the producer to change how they do things.



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.

A target is a good thing but care needs to be taken not to promote unintended consequences. Rather than a target (number or percentage) for cups recycled, reversing it to a maximum of cups disposed of (i.e. not recycled) of **per drink sold** would also incentivise the use of reusable cups.

## 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.

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.

- These need to be carefully considered to ensure that they are both accurate and understandable to the public.
- There needs to be a consistent approach linking this to the proposed national 'core list' for collections.
- It is essential that the use of labels is supported by ongoing communications and education campaigns.

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.

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

Please describe briefly.

- Simply state the percentage of recycled content.
- Use a 'traffic light' colouring system if this can be done without causing confusion with the nutritional information.

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

Please describe briefly.

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

## 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.

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.

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.

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.

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.

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.

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 a good thing which should be promoted.  
Also, the definition of "closed loop" needs to put more emphasis on reuse.

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.

- We would like to change behaviours and manufacturing to remove composite packaging altogether, possibly through an outright ban, or at least to ensure that any produced is easily separated for recycling.
- Care needs to be taken to ensure that any target requires genuine recycling to ensure that there is no perverse incentive to continue to produce 'recyclable' composites which are less easy to recycling than alternative single-material packaging.
- Another possibility may be to consider a tax on composite packaging to discourage it.

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.

There is insufficient information for us to form a view. However, whichever model is chosen, it needs to be significantly different to the existing system of Packaging Recovery Notes which fails to pass costs through to local authorities which end up collecting and recycling/disposing of much of the packaging material.

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?

Whichever model is chosen, it needs to be significantly different to the existing system of Packaging Recovery Notes which fails to pass costs through to local authorities which end up collecting and recycling/disposing of much of the packaging material.

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.

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?

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.

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.

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.

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?

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.

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?

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.

## 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.

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.

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.

## 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?

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.

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

a) Yes

b) No

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.

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



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.

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.

It will give consumers a better understanding of what we want them to do and why.

## 10. Compliance monitoring and enforcement

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

(a) Yes

(b) No

If yes please explain which datasets will be needed.

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

(a) Yes

(b) No

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

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

(a) Yes

(b) No

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

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

- (a) Yes
- (b) No
- (c) I neither agree nor disagree

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

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

- (a) Yes
- (b) No
- (c) I neither agree nor disagree

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

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

- a) Yes
- b) No

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

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

Please provide brief details.

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

- a) Yes
- b) No
- c) I don't know

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

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

- a) Yes
- b) No
- c) I don't know

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

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

a) Yes

b) No

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

- It is difficult to enforce against MRFs who are doing sampling as the code of practice is on set frequency and quantity, and there is no guidance on how or on what should be looked at. Better guidance and enforcement would level the playing field between providers.
- Would it be more helpful to use output based monitoring instead of input? At the MRF ELDC used to take its recycling to, everything was weighed at the end of the process so data was accurate.

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

(a) Yes

(b) No

(c) I neither agree nor disagree

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

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

(a) Yes

(b) No

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

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

(a) Yes

(b) No

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

The requirement is sufficient but needs to be properly established and regulated.

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

a) Yes

b) No

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

## 11. Estimated costs and benefits

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

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

## 12. How will we know when we've been successful?

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.

- The objective of the whole EPR approach seems to have been switched from better/less/easily recyclable/user-friendly packaging to who pays, who administers and who benefits. It's almost like packaging (the real issue) is secondary to those details.
- Communication has a key part to play in the success of this, and an approach should be adopted where incorrect or misleading information is not tolerated.