



"Working for our members to be the voice of government on waste minimisation and recycling issues"

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ADVISORY COMMITTEE

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February 2012

Dear Sir/Madam

Consultation on recovery and recycling targets for packaging waste for 2013-2017

I am writing to present the LARAC response to the Packaging Recovery and Recycling Targets Consultation, which is set out below. Thank you for the opportunity to respond.



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This response is sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of around 324 local authorities across England, Scotland, Wales and Northern Ireland whose waste management and recycling professionals co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Our response has been peer reviewed by members of LARAC's policy team and executive committee. LARAC members have also been invited to comment on the consultation through the members' discussion forum on our website. All contributions received have been taken into account in drafting the response below.

If you have any queries on this response then please contact me at andrewj.craig@ntlworld.com

Yours faithfully,

Andrew Craig

Dr Andrew Craig
Principal Policy Support Officer, LARAC



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Proposals for recovery and recycling targets for packaging waste for 2013-2017 – general comments

Of the options given in the consultation document, LARAC most supports the Government's stated preferred option, 3a).

We agree that voluntary responsibility deals are less likely than statutory targets to achieve the highest environmental, social and financial aims of the legislation. Responsibility deals would be likely to introduce inequities into the market place in which firms wishing to be environmentally responsible would find themselves potentially at a competitive disadvantage compared with organizations seeking only to do the minimum required to comply with the law.

Although in principle LARAC would support the establishment of Deposit Refund Scheme (DRS) for beverage containers, we understand the concerns of the retailers, drink manufacturers and packaging manufacturers that it would be expensive to set up and operate - and agree with the point that it would only apply to a small part of the packaging market. DRSs need further careful consideration. This could be dealt with separately as a means of helping to achieve very challenging recycling targets. *Statutory targets* will be the most effective drivers of increasing packaging recycling.

However we do have concerns that, even in Option 3a), the recycling targets proposed are, in some cases, not challenging enough to optimise the development of supply chains for secondary packaging materials. In most cases the targets are less challenging than those recommended by the Advisory Committee for Packaging (ACP) in its Annual Report 2010/11 (published June 2011).

The Government's proposal to set targets for 5 years starting in 2013 indicates a medium term approach (the minimum indicated by the ACP). LARAC would prefer a longer term approach, at least to 2020 (the year up to which the ACP has suggested targets). This would further reduce risk to compliance schemes and recycling businesses and increase investor confidence. It would also provide local authorities with better information on the basis of which to negotiate new recycling contracts and develop partnerships with private sector organizations that will continue beyond 2017. Many recycling contracts have a duration of 5 years or more, so targets at least to 2020 would be more helpful than targets to 2017 for procurement of new recycling services and development of new partnership arrangements during the forthcoming 5 years.

We note that user industries (e.g. base metals, chemicals and petrochemicals), that do not traditionally work closely with the waste management industry (except as a service industry), are not listed among the sectors and organizations to which this



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consultation is expected to be of greatest interest (paragraph 6). This omission may indicate that the views of these industries and sectors haven't been solicited, or that the importance of this consultation hasn't been fully explained to them. We venture to suggest that, as they are potentially interested in developing new supply chains for secondary raw materials, they would argue strongly towards the development of long term, very challenging, recycling targets for packaging materials, in order to reduce risks on significant investments.

In response to the consultation questions:

Question 1 (Are the projections for waste arisings reasonably accurate?) and
Question 2 (Are the predictions for obligated tonnages reasonably accurate?)

LARAC participates in the ACP and Packaging Recycling Action Group (PRAG), and has been party to other meetings at which these projections have been discussed. It is difficult to know how accurate these projections will prove to be, but they have been carefully considered on the basis of the best evidence and expert opinion from all quarters - and are the best projections that can be made at the moment.

Question 3 (Views on the proposal to remove composite material from the waste calculations)

LARAC agrees with this in relation to aluminium and plastic for the reasons that are well made in the consultation document. However 75% of composite packaging can be recycled as board. We suggest therefore that 75% of composite packaging could be retained in the waste calculations as recyclable paper packaging.

This proposal may be connected with the decision not to increase statutory recycling targets for paper packaging, probably because the recycling rate (81.9% in 2010) already exceeds the ACP's recommended recycling rates for paper.

Notwithstanding that the composite packaging industry has already agreed recycling targets with certain retailers, the Government could achieve more by establishing a statutory target for composite packaging that could also help drive the development of technology to recover aluminium and plastic from composite packaging.

Question 4 (Do you support the proposed approach to split the glass target in line with end use, limiting the allowable recycling as aggregates)

In principle, LARAC supports this measure that will maximize the environmental benefits of recycling glass. However some local authorities that collect mixed glass for recycling to reduce overall costs perceive that they will be disadvantaged financially by the PRN subsidy being "concentrated" on recycling into containers. The proposed higher targets for recycling into containers should be introduced gradually at first, allowing local authorities sufficient time to consider the implications of



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changes for their collection systems and costs. For example a local authority collecting mixed glass at the kerb side that is then recycled into aggregate at the moment because a suitable separation facility isn't available would wish for a firm signal on the likely price differential between container recycling and aggregate recycling at least 8 -10 years into the future, in order to take long term decisions about its collection system and potential investments in recycling technology.

We would recommend that targets for glass recycling into containers be increased more steeply than proposed in the longer term, but that these increases should be moderated over the next 5 years, giving time for the market to react to long term signals.

Question 5 (Do you support the Government's preferred option? Views are also solicited on proposed increases to specific materials targets)

Our general comments above refer. On individual material targets our response is as follows:

Paper No increases are proposed. The proposed statutory recycling rates will not drive increased recycling of cardboard packaging. We refer to our response to question 3 above.

Glass No overall increases are proposed. We refer to our response to question 4 above.

Aluminium The proposed increases are achievable and reasonably challenging.

Steel Increases are proposed that are far below those put forward by the ACP. We are not clear why this should be the case. With additional financial support local authorities would be able to increase significantly the recycling of post consumer steel containers.

Plastics In this complex area, the proposed increases look reasonable at the moment. We would recommend that the increases be specified as floor increases, subject to possible review upwards as new recycling technologies are developed. The Government may find it needs to agree exactly how *recycling* is defined, as new technologies (e.g. feedstock recycling, plastics to fuels) may provide opportunities to increase considerably the proportion of post consumer plastics that can be materially recovered. Higher plastics packaging recycling targets from 5-10 years time may help stimulate innovation and technological development.

Wood Local authorities have limited interest in recycling of wood packaging. Other drivers (the Renewables Obligation, Renewable Heat Incentive) appear to



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have stimulated the market for wood sufficiently to achieve rapidly increasing recycling and recovery rates without the need of high statutory recycling targets.