



Local Authority Recycling Advisory Committee

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Producer Responsibility obligations (Packaging Waste) Regulations 1997 ( As Amended)

Thank you for the opportunity to respond to the paper on measures to increase obligated tonnage. The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities, including 373 in England, whose waste management and recycling professional's 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 Authorities.

As was the case for the first consultation LARAC is not qualified to comment on the detailed questions in the consultation document about specific definitions of businesses or how they view the additional scrutiny and intervention mechanisms proposed within the consultation.

However LARAC in respect of the following questions wishes to comment upon the potential impacts proposals may have on Local Authorities.

Q3 LARAC would not wish by any means to try to minimise the amount of packaging that the industry recycles or recovers under the Regulations. This may affect the ability of local authorities to achieve their own targets for landfill avoidance. Businesses that have the licensee relationship in the case of brewers should be given obligations as if they were part of one group regardless of their relationship to a licensor and dealt with as a single group not limiting obligations to branded or marked goods.

Q4 LARAC favours a roughly equal (tonnes) approach as this will allow capacity and market pricing to grow and hopefully reduce the potential for statutory obligations to distort markets and exacerbate price fluctuations that may occur.

Neil Ferris

For LARAC Policy team