

Summary of LARAC response to main areas of RAWs EPR Consultation 16.05.19

Question	LARAC Response
Q6 EPR Principles	LARAC agrees with most of the principles proposed for packaging EPR. The requirement on local authorities to collect a consistent set of materials should only be applied where viable end markets exist for the materials and where full net costs are provided to local authorities by producers, otherwise this is not implementing the concept of EPR.
Q10 Full cost recovery	LARAC supports the definition adopted and welcomes the fact that it includes disposal and littering of packaging and not just the recycling element. Netting off revenue from the sale of materials is appropriate. LARAC supports the proposal that producers should also fund national and local communication campaigns for recycling and littering as outlined in the consultation.
Q14 Approved List	LARAC supports the development of an approved list against which fees can be determined. LARAC is aware that OPRL has already done good work in this area and that links to recyclability and labelling should be made when designing the format and operation of the approved list.
Q18 Obligation point	LARAC believes the brand is the most suitable place in the supply chain to apply compliance. Given that other systems across Europe have a single point of compliance the evidence is clear that this is the most appropriate course of action. We believe the seller may be in less of a position to drive better product design than the brand.
Q26 Collection Infrastructure	Local authorities should receive payments for the provision of services related to packaging as this is a fundamental part of producer responsibility and moving to a situation where producers bear the full life costs of their products. Payments for collecting and managing household waste should not be related to minimum service standards. The materials that local authorities collect are entirely dependent on the sorting infrastructure they have access to and the availability of end markets for the material that can be sorted to a suitable quality level. LARAC believes that use of reference and average costs goes against the concept of producer responsibility and full net cost recovery.
Q40 Packaging Labelling	LARAC supports the mandated use of labelling indicating if packaging is recyclable or not. LARAC would also want to see other “recycling labels” removed from packaging as these are often misleading and meaningless from a consumer recycling advice point of view.

	<p>LARAC believes that OPRL should be taken forward as the mandatory label for recycling in the UK. It is already well recognised by consumers, has built up a wealth of consumer insight and knowledge and is widely backed and used by the retail and packaging industry already.</p>
<p>Q56</p> <p>Governance Model</p>	<p>Model 2</p> <p>The creation of a central body allows for strategic oversight that could be beneficial to developing end markets, collection, better packaging design and higher recycling. Local authorities would only be dealing with one organisation so there is no procurement or contracting issues. It therefore has a level of simplicity and clarity that local authorities believe would be very beneficial not just to them but the system as a whole. The fact that this model reduces the need to issue evidence and so cuts out the market aspect and trading is again a move to a simpler system that should be a benefit to producers and others.</p>