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03 | Message from our Managing Director

We have held release of this newsletter in anticipation of hearing responses on key consultations from last year.

It paid off – as you can read below – and there are some pleasing signs that government has listened carefully to some of the key concerns raised by producers and other stakeholders such as ERP.

The long-awaited response from the four governments to the 2021 consultation on EPR for Packaging was released on Saturday 26 March 2022 in two documents:

- EPR: Summary of Consultations and Government response(69 pages); and
- EPR: Detailed Consultation Responses Analysis(259 pages)

There is a lot to read and digest – so we will do that and arrange more specific communications and events for members in due course.

Key points are:

- Implementation delayed a year from 2023 to 2024. This will involve partial EPR implementation from 1stApril 2024 relating to local authorities' costs; and full implementation of EPR in 2025 based on modulated fees;
- The current threshold for packaging payments will be retained:
 £2m turnover and 50t of packaging. but, for reporting purposes,

- all companies with £1m turnover and 25t of packaging will need to report data;
- Approaches to the collection of packaging waste from businesses will be subject to further discussion and development through a task force:
- This appears to be one of the key changes which has resulted in a reduction in the estimated costs of Packaging EPR from £2.7 bn to £1.7 bn annually

The most immediate thing we will see is legislation on Data Reporting that will come into force on 1 January 2023. This is to ensure that producers will have collected and reported data to support the new EPR for Packaging system in 2024. Of course our membership and data service teams will be keeping a close eye on this and we will keep you updated.

Included are some announcements on Deposit Return Schemes – though the full consultation responses on this and Collections Consistency will be published in due course.

The key points here are:

- England, Wales and Northern Ireland will implement an 'all in' DRS for single use drinks containers containing between 50ml and 3ltr of liquid – this is the same as Scotland is already in the process of implementing; However,
- Glass will be excluded from the DRS in England and Northern

Ireland – it is already included in Scotland - and Wales plans to include it too.

Of course, we are concerned at the practical, administrative and financial impact on producers, retailers and consumers of this type of divergence in policy between the devolved administrations.

Other news updates for you from me are also significantly consultation focused:

- Since the newsletter was drafted we have had the announcement of 2022 WEEE targets by Defra. Although there were relatively small changes from those proposed it is again good to see that our comments and those of producers in relation to some targets have been heard. We will be confirming obligations to members shortly;
- Defra have also made stakeholders aware that their delayed consultation on WEEE Regulations can be expected in summer 2022 and that implementation is unlikely to be sooner than 2025 – with the potential for additional measures beyond that;
- With delays to EPR for Packaging and WEEE now advised we similarly anticipate the consultation on Battery Regulations will be later this year – and with implementation unlikely to be sooner than 2025.





04 | Member news



Data Rounds - EEE & Battery

Q1 2022 B2C WEEE and Battery weight data will be due for reporting very shortly. Please can all Members submit their data through the ERP portal no later than 14th April 2022 (one day earlier than usual due to UK Bank Holiday).

As usual, we also kindly ask Members to:

 Ensure that all WEEE and batteries made available to the UK

- market is reported in the relevant reporting periods (see table below);
- Have submissions approved by a legal signatory of the company or delegated authority who has prior written consent for 2022
- Account for any fluctuations in data by including a brief explanation within the data submission (if prompted when inputting the data). Please note that comparisons are made against the data from the same period of the



Packaging – Data Round and 2022 Registration

Thank you to all our Packaging Members who have supported us in submitting their 2022 packaging submissions already, reporting weights of packaging handled throughout 2021. As we approach the legal deadline for 2022 Packaging Compliance registrations, we continue to work with Members to ensure they can register on time.

This has been an ongoing process since the start of the year, all in preparation for the Scheme's April deadline, when we will be required to submit our 2022 packaging registrations to the relevant Agency to register our members. Once these registrations have been approved by the relevant Agency, we will then communicate this to our Members through Certificates of Registration. These are likely to be issued in May.

Reporting Periods	Reporting Deadlines
Q1: 1st January to 31st March	Thursday 15th April 2021
Q2: 1st April to 30th June	Thursday 15th July 2021
Q3: 1st July to 30th September	Friday 15th October 2021
Q4: 1st October to 31st October	Friday 14th January 2022
2021 B2B EEE: 1st Jan to 31st December	Friday 14th January 2022





05 | Member news



Industrial and Automotive Battery Data for 2021

ERP are in the process of gathering weight data of Industrial/Automotive batteries from affected Members, which we are required to report to the relevant Agency by 31st March. This includes the following types of data, which is required separately for both Industrial and Automotive batteries:

- Placed onto the market tonnage for the previous compliance year
- Placed onto the market tonnage that will leave the UK market before use
- Tonnage your company has been responsible for collecting or taking-back
- Tonnage that your company has been responsible for delivering to an ABTO or ABE

If you are a registered Producer of Industrial/Automotive batteries through ERP, your Account Manager will have already contacted you to request the data. If you have not yet provided the above information on the bespoke

form provided, please ensure that this is completed as a matter of urgency. If you are not a registered Producer of Industrial/Automotive batteries but believe your business may handle these types of batteries, you may find the Government's webpage on classifying batteries useful. This can be found here.

Joint Trade Association WEEE Compliance Fee Proposal Accepted

The Government have approved and will continue with the WEEE recycling compliance fee system for the 2021 compliance year, as proposed by the Joint Trade Association (JTA). Within the JTA, ERP remain an active Member, and are pleased to have shared a part in shaping the proposal.

The compliance fee system allows compliance schemes and obligated businesses who are in shortfall of recycling evidence to complete their WEEE recycling evidence targets by paying a fee. The funds raised are then used for WEEE awareness campaigns and conducting technical research. Additionally, the fee prevents Compliance Schemes from over-collecting WEEE, surpassing their collection targets, with the intention to then supply surplus evidence to other Compliance Schemes still looking to meet their obligations at higher rates.

Packaging PRN Market Update for Q1 2022

Last month, ERP issued our latest PRN market update for Q1 2022, so we hope that this has been received by all interested parties. The update includes information relating to material specific PRNs and provides commentary on market expectations for the coming period.



Now Available! – 2022 ERP Membership Compliance Badges

If your business is looking to include environment/compliance information in brochures, on the company website, or in sales documents, ERP would encourage you to use our Membership Compliance Badges, which are now available for 2022. This provides opportunity for Members to prove their Compliance Scheme Membership, and that their Extended Producer Responsibility [EPR] obligations are being fulfilled.

The badges come in a variety of designs and sizes, so please contact your Account Manager, if you are interested.





06 | Industry news



School kids to participate in largest collection of e-waste in UK

Through a new partnership with Wastebuster, Currys, Microsoft, and Recycle Your Electricals, over 200 schools across the UK have signed up to take part in a Hidden Treasure Hunt for Waste Week 2022. The aim is to inspire students, families and their local communities to find any unwanted electrical items and take them into a Currys store to be recycled.

Electrical waste is the fastest growing waste stream both globally and in the UK. For 2022, Waste Week is focusing on electrical and tech waste that is often hidden around people's homes, to teach children the benefits of choosing more environmental and sustainable solutions and adapting to a more circular economy.

A wide range of new curriculum-linked educational resources will be available for teachers to support student learning and the launch of the competition. This includes an entertaining film featuring popular children's characters,

exploring how electrical and tech waste is recycled.

There are also considerable rewards for schools for encouraging their communities to recycle. £5k of Microsoft tech will be won by the school that gets the most students and families to clear out their old electricals and tech, £2k for the second-place school, £1k for third and fourth-placed schools, and a £500 prize draw raffle for two schools that have got involved.

EPR for Packaging Reforms – officially delayed

Extended Producer Responsibility for Packaging reforms will not be phased in from 2023 as originally planned, DEFRA has confirmed.

Initially, major reforms were scheduled for the Packaging Waste Regulations system for 2023. The reform proposals indicated drastic changes in comparison to the current system and significant cost increases were anticipated. However, due to the impact of the Covid-19 pandemic and concerns over the tight timescale of implementation, DEFRA has now confirmed the reforms will no longer begin in 2023.

Therefore, we can expect that the current Packaging Recycling Note (PRN) system will continue throughout next year, and DEFRA will confirm 2023 Packaging Recycling Targets in due course.

More information can be found in our Member update, here.



Plastic Packaging Tax - Dealine **Imminent**

Very shortly, HMRC's brand new Plastic Packaging Tax will be live! From 1st April 2022, if you are a manufacturer or importer of plastic packaging, you could be liable to comply with this new tax. This includes paying £200 per tonne on obligated plastic packaging with less than 30% recycled content. Additionally, data reporting for the tax is required at component level.

Last month, HMRC published new guidance to help businesses prepare for the tax. The first helps businesses determine if they are liable for the tax, and the second discusses which packaging is within the scope.

ERP are continuing to support Members prepare for this new tax, and have developed webpages to summarise key information, found here. This includes links to enquiry forms, where we can help to answer your questions directly, as well as Governmental policy papers & guidance.

Furthermore, ERP are offering data services to support businesses gather the appropriate levels of data required for the tax. If you would like any more information, please contact your Account Manager, or email

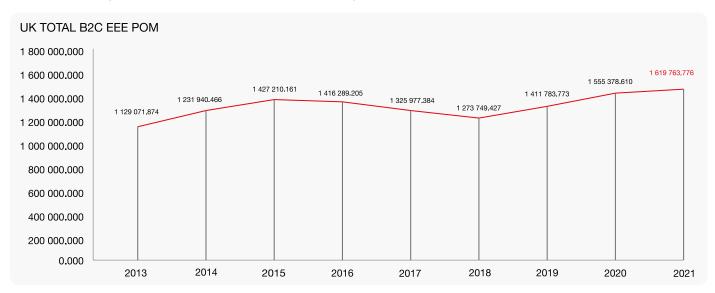
ukcompliance@erp-recycling.org





WEEE

The latest data (Q4 2021 UK national data from the EA)



Volumes of EEE placed on the market (POM) 2021 saw the highest ever volume of EEE: At the category level, all apart from Display reported increases on 2020:

	2020	2021	Variance	Variance
	(tonnes)	(tonnes)	(tonnes)	(%)
LDA	621 343.353	660 590.325	39 246.972	5.94%
COLD	245 574.285	251 989.739	6 415.454	2.55%
DISPLAY	106 144.617	98 014.491	-8 130.126	-8.29%
Cats 2-10 SMW	539 574.154	565 551.640	25 977.486	4.59%
LAMPS	6 545.635	7 273.453	727.818	10.01%
PVP	36 196.566	36 344.128	147.562	0.41%
TOTAL	1 555 378.610	1 619 763.776	64 385.166	3.97%

Volumes of WEEE collected

As with the last few years, small mixed WEEE (SMW) again missed the target set by DEFRA by some distance. Display and cooling exceeded the 2021 targets, as had been anticipated by analysis of Q1-3 data:

Category	Q1-Q4 2021 UK WEEE collected	2021 DEFRA targets	Progress to targets %
LDA	182 635	187 398	97%
COLD	141 309	137 030	103%
DISPLAY	39 705	37 726	105%
Cats 2-10 SMW	122 613	137 056	89%
LAMPS	4 024	4 145	97%
PVP	254	274	93%
TOTAL	490 541	503 629	97%





Outlook for the compliance year

DEFRA released proposed WEEE targets for 2022 to stakeholders for a short consultation.

The approach was similar to that of previous years – with the trendline from previous years being used to establish an estimate for volumes likely to arise in 2022. As 2020 saw an exceptional impact from Covid-19 this was not included in the trend analysis. Adjustments to the trendline estimate were made at the individual category level for known factors – and an element of ambition for volume growth was also included.

ERP prepared its own analysis and made a detailed response to the consultation; in raising particular concerns about the proposed targets for SMW which once again were proposed at levels well above the trendline. This has been a pattern of previous years - with targets set above the trendline and against our estimates for volumes likely to arise - and national volumes consistently failing to achieve the target - resulting in schemes (and thus Producers) paying a significant amount in compliance fees. Whilst ERP are keen to see a greater proportion of WEEE collected and treated through the obligated system (as opposed to hoarded or discarded in

residual waste), we do not believe that ambition should form the basis for the setting of targets.

Final targets will be confirmed by DEFRA by the end of March. We will receive our scheme targets for 2022 from the Environment Agency in early April based on the POM market share of our members in each category in 2021. We will then advise members of their individual obligation for each stream for the year and invoices for Q2 and onwards will be based on these.

Batteries

The latest data (Q4 2021 UK national data from the EA)

Volumes of Portable Batteries placed on the market (POM)

There was a 7% increase in the total amount of batteries POM in 2021 compared with 2020:

	2020	2021	Variance	Variance
	(tonnes)	(tonnes)	(tonnes)	(%)
Lead Acid	1 367.497	1 358.356	-9.141	-0.67%
NiCd	307.383	198.143	-109.240	-35.54%
Others	39 190.665	42 197.060	3 006.395	7.67%
TOTAL	40 865 . 545	43 753 . 559	2 888.014	7.07%

Volumes of waste batteries collected

2021 saw the highest ever volumes of waste portable batteries collected:

	2020	2021	Variance	Variance
	(tonnes)	(tonnes)	(tonnes)	(%)
Lead Acid	11 470.637	14 101.138	2 630.501	22.93%
NiCd	534.681	324.086	-210.595	-39.39%
Others	5 722.906	3 867.014	-1 855.892	-32.43%
TOTAL	17 728.224	18 292.238	564.014	3.18%





2021 saw the highest ever volume of portable batteries POM:



Outlook for the compliance year

The target for collection and recycling of waste portable batteries in 2022 remains at 45% of the amount placed on the market in the current and previous two years; as a result, the exact tonnage target for the UK and for the ERP scheme remains fluid.

For a variety of reasons, 2021 saw a particularly large amount of portable lead acid batteries collected – it is likely that this will be a peak year for collections of this type. Compared to 2021, we anticipate a reduction in the amounts of portable lead acid

batteries collected and recycled in 2022 – and so collections of 'other' chemistries will need to increase. We are confident that this can be achieved.





Packaging

The Environment Agency released the latest recycling data for 2021 on 31 March 2022. It shows that the PRN system has delivered full compliance with Government targets for the UK:

Material	UK Requirement (tonnes)	Received For Recycling	Received Over Requirement
Paper	3 367 022	4 101 300	22%
Glass	1 929 631	2 006 025	4%
Aluminium	138 374	164 678	19%
Steel	387 656	451 557	16%
Plastic	1 142 527	1 202 342	5%
Wood	352 200	678 134	93%

However, looking at the detail behind some of the numbers, we note that the UK needed to make use of carry over tonnages to achieve compliance in glass and plastic. In addition, carry over volumes also dropped when comparing 2020/2021 to 2021/2022. This is particularly the case for glass and plastic, and to a lesser extend for Paper and Wood. Only Steel has generated a higher carry over than previously with Aluminium staying stable.

It is too early to say how 2022 will shape up. Business targets are increasing for all except Wood.

This tends to suggest that more PRNs will be required. The PRN system has a decent track record adapting to challenges like shortages of wastes being available for processing, though this is of course underpinned by the need for increased funding to stimulate supply. Overall, it is encouraging to see that we can still start 2022 with some surplus in all materials.

The producer data reporting process is currently in its final stages and obligation data for 2022 is expected to be published in the next few weeks, alongside information about Q1, 2022 recycling.



Introduction of mandatory digital waste tracking

Over 200 million tonnes of waste is being produced in the UK each year and there is currently no single or comprehensive way of tracking it, with legislation relating to the transport, management and description of waste being introduced separately over the last 30 or so years.

Read more here

Consultation on the reform of the waste carrier, broker, dealer registration system in England

The current carriers, brokers and dealers (CBD) regime requires any person or business that transports waste, buys and sells waste, or arranges the transportation of waste in England to be registered with the Environment Agency as a waste carrier, broker or dealer.

Read more here





Data Services



Plastic Packaging Tax

ERP have been busy developing a service around the reporting requirements of the new Plastic Packaging Tax. Building on our data collection and reporting experience for the Packaging Waste Regulations, EPR will be offering a new service for businesses affected by the new tax.

The tax will come into force on 1st April 2022 and will be charged at a rate of £200 per tonne. This applies to plastic packaging produced in or imported into the UK that does not contain at least 30% recycled plastic.

Account Managers have been in touch with customers they believe will be impacted by the tax to discuss the service and reporting requirements in more detail.

Businesses should also carry out their own due diligence checks in respect of Plastic Packaging Tax. This will apply to you if you either manufacture

plastic packaging components or import plastic packaging components.

If you have any questions about the Plastic Packaging Tax and how it will affect your company, please contact your account manager directly or the Data Services team at:

ukdataservices@erp-recycling.org

For the latest HMRC guidance on the tax please click here



Packaging Data Collection

Data collection exercises are already well underway for this year, with several new data collection exercises commencing in the coming weeks, account managers may be in contact to discuss specific details.

Any support you can provide with this activity will be greatly appreciated.

As you might be aware, we now collect data at a granular level which includes packaging components, polymer types, recycled content percentages and recyclability labelling. The reason we collect this detailed information is to future proof the service for the changes in EPR over the next few years.







12 | Featured article:



Tackling plastic pollution on a global scale

The United Nations Environment Assembly (UNEA) has approved a resolution to create the world's first global plastic pollution treaty. More than 150 countries - including the UK - have started negotiations to end the rapidly growing plastic pollution crisis. While the terms of the treaty are still to be agreed, it could include measures that promote sustainable production and consumption of plastics, as well as more environmentally sound waste management.

The plans have received considerable support from the private and third sector with 111 organisations having signed The Business Call for a UN Treaty on Plastic Pollution, including Coca-Cola, PepsiCo, P&G and Unilever.

It is also hoped it will help tackle marine plastic pollution, one of the greatest global environmental challenges. At least 14 million tons of plastic end up in the ocean every year, most of it from lower and middle-income countries with less capacity to recycle it. It is predicted that unless significant action is taken worldwide, there will be a threefold increase in the amount of plastic flowing into the ocean by 2040.

By Chloe Grainger

Additional reading Nations sign up to end global scourge of plastic pollution Read here





13 | Meet a team member: Laura Belerte



How long have you been with **ERP UK?**

A I joined ERP on 22nd Feb 2022.

Tell us about your experience before joining the ERP team?

A I moved to the UK in 2004 and worked in the hospitality business for 10 years where I gradually progressed to a managerial position. While working, I completed a BA degree in International Business Management and Globalisation at De Montfort University, Leicester. At that point, I was looking to redirect my career and so joined a paper manufacturing global organisation. While there I learnt and developed my B2B/ customer service and financial management skills. The job had limited opportunities for career growth so I decided it was time for a change.

What does a typical day look like for you?

A Given that I am a newbie there is a lot of learning, listening and taking notes.

What motivates you in your

A This is a new industry for me, so I like the challenge of learning the unknown and really excited to be part of the business. I'm always looking to do extra, do better, it pushes me to achieve and do more. Now that my kids are growing older I can focus on my own growth.

What do you enjoy doing outside work?

A I like to do fun, family outings with my sons and friends. I like iceskating and tennis, and I love to I have a passion for dancing including salsa, bachata and

Your favourite music genre/ band(s)?

kizomba.

A At the moment, probably Latin music. In all honesty I don't really have a favourite genre, artist or song... it depends on my mood, at the time.

Q Favourite holiday destinations?

A Kathmandu, Nepal and Valencia, Spain







14 | Events & workshop diary



THE LONDON CONFERENCE 26th April – London

With a mixture of panel discussions, case studies and practical guidance, the conference will be the meeting point for all London local authorities looking to address the urban challenges they face.

Visit event website **here**

RESOURCES & WASTE STRATEGY CONFERENCE 12th May – London

The event is expected to be of interest to local authorities. reprocessors, retailers, the waste management sector, packaging companies, manufacturers and all those involved in the circular economy.

Visit event website here



AWARDS FOR EXCELLENCE in Recycling & Waste Management May - London

Visit event website **here**

CIWM RESOURCE CONFERENCE CYMRU 17th May - Cardiff

we explore the key issues and

Visit event website here



ERP WORKSHOPS 2022

Our workshops provide detailed training for our members about the Regulations and how to apply them in your business.

They are FREE to attend and members give very positive feedback about their helpfulness.

For 2022 we plan a combination of online and face-to-face events.

Planned events include:

- Packaging 15th Sept
- WEEE & Batteries 16th June
- WEEE & Batteries 16th Sept

Get in touch to book a FREE 2022 workshop with us. ukcompliance@erp-recycling.org





15 | ERP's EPR glossary

ATF Approved Authorised Treatment Facility (for WEEE)

ABE Approved Battery Exporter

ABTO Approved Battery Treatment Operator

AE Accredited Exporter (for Packaging)

AR Accredited Reprocessor (for Packaging)

ATF Authorised Treatment Facility (for WEEE)

BFR Brominated Flame Retardants

CA site Civic Amenity (see also HWRC)

CIO Consumer Information Obligation (for

Packaging)

CIWM Chartered Institution of Wastes

Management

CSR Corporate Social Responsibility

DCF Designated Collection Facility (for WEEE)

DEFRA Department for Environment, Food

and Rural Affairs

DRS Deposit Return Scheme

DOENI Department for the Environment Northern Ireland **DTS** Distributor Takeback Scheme

(for WEEE)

EA Environment Agency (see also SEPA, NRW

and NIEA)

EEA European Environment Agency

EFW Energy from Waste

ELV End of Life Vehicles

EMS Environmental Management System

EPR Extended Producer Responsibility

ESA Environmental Services Association

HDPE High Density Polyethylene

HWRC Household Waste Recycling Centre

LA Local Authority

LARAC Local Authority Recycling Advisory

Committee

MRF Materials Recovery Facility

MSW Municipal Solid Waste

NIEA Northern Ireland Environment Agency

NPWD National Packaging Waste Database

(Batteries & Packaging)

NRW Natural Resources Wales

ODS Ozone Depleting Substance

PCB Polychlorinated Biphenyl

PCB Printed Circuit Board

PERN Packaging Waste Export Recovery Note

PP Polypropylene

PPT Plastic Packaging Tax

PRN Packaging Waste Recovery Note

PRO Producer Responsibility Organisation

PS Polystyrene

PS Polystyrene

PVC Polyvinyl chloride

RCV Refuse Collection Vehicle

ROHS Restriction Of Hazardous Substances

(in EEE)

SEPA Scottish Environment Protection Agency

WAC Waste Acceptance Criteria

WBA Waste Batteries and Accumulators

WCA Waste Collection Authority

WDA Waste Disposal Authority

WEEE Waste Electrical and Electronic Equip-

ment

WFD Waste Framework Directive

WRAP Waste and Resources Action Programme

WBA Regulations means The Waste Batteries and Accumulators Regulations 2009 (SI 2009/890);

WEEE Regulations means the Waste Electrical and Electronic Equipment Regulations 2013 (SI 2013/3113); and

Packaging Regulations means The Producer Responsibility Obligations (Packaging Waste) Regulations 2017 (SI 2007/871)





16 | Get in touch

Please get in touch – we'd love to hear from you!

For general enquiries:

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Our services

WEEE Compliance:

Simplifying the recycling of waste electrical and electronic equipment Visit our webpage here

Batteries Compliance:

Simplifying the recycling of portable batteries Visit our webpage here

Packaging Compliance:

Simplifying the recycling of packaging Visit our webpage here

Data Services:

Simplifying your data and submissions Visit our webpage here

Plastic Packaging Tax:

New tax on plastic packaging in the UK - April 2022 Visit our webpage here



ERP UK website

