

## Consultation on the Waste Prevention Programme for England: Towards a Resource-Efficient Economy

### Response from the Advisory Committee on Packaging (ACP)

- A. Our perspective is that the waste prevention programme for England must be more ambitious and set out a clear vision for success in reducing single-use packaging to increase resource efficiency. The waste hierarchy should move to reduce, reuse, replace and recycle with closed-loop usage becoming the overriding norm and measure.
- B. The ACP believes citizens are critical to improvement related to waste. Their behaviour, eg, on waste disposal can yield volumes; countries that have pay-as-you-throw schemes have shown relatively good advances in waste prevention, recycling rates and overall material management. It is probable that challenging industry and supply chains alone will not go far enough. The government should invest in citizen engagement programmes including through local authorities who have close relationships with most through bin collections. A suggestion for consumer engagement is below.
- C. We recommend that the government sets up advisory committees similar to the ACP on the non-packaging themes in the waste prevention programme; they have the potential to be powerful advocates for change and a mechanism to develop and test ideas. Each committee should work to specific targets and a timetable for delivering voluntary measures. A failure to deliver voluntary measures should result in legislative change.

- D. **Packaging, plastics and single-use items**: In support of the aim we set out our recommendations below:

#### **(a) To encourage a shift away from hard-to-recycle and single-use products:**

1. Define reusable packaging, including a minimum level of resource productivity and allow items to be recycled at their eventual end of life.
2. A new Deposit Return Scheme (DRS) should be tasked to collect 95% of hard to recycle products, eg take-away containers and wrappers, beverage cups, clothing packaging, tetra-pak cartons and pouches.
3. Aim towards 90% of recycled packaging to be closed-loop by 2030, with graduated targets linked to levies for failure.
4. Aim for a 20% refill target on all packaging placed on market including on distance-sellers such as online marketplaces, with the latter therefore needing to collect packaging back.
5. Provide a VAT exemption for reusable/refillable packaging design or a tax on single-use products.
6. Provide a tradeable credit for post-consumer reuse.
7. Ban plastic (and textiles and electronics) from the household rubbish bin.

**(b) To support research in and innovation for more sustainable materials and systems:**

1. Create measures for the effectiveness of waste prevention methods in the context of all waste (eg the last plan was 1% or 2% effective?).
2. Complement recycling rates by a performance report measuring per resident or household waste not reused, recycled or composted by local authority area.
3. Create a network of packaging circular economy hubs to gather data, pilot waste tracking and smart technology, trial closed-loop and reusable packaging, create no-waste neighbourhoods to test systemic and integrated design change from the bottom up.
4. Build on the Office of National Statistics' national materials database by developing an enhanced waste tracking system using, eg, radio-frequency identification, preparing official transfer documents, identifying and addressing information gaps, and monitoring raw materials embodied in traded goods.
5. Require publication of the proportion of refillables/closed-loop/recycled content/raw materials in purchasing and procurement decisions for all large companies and government offices.
6. Use modulated fees in Extended Producer Responsibility to reduce costs proportionally for closed-loop recycling content above 70%.
7. Introduce improved market surveillance and fines for failing to implement eco-design or labelling requirements.
8. Develop data and monitoring systems that can provide the insight required to plan and target interventions for reducing or preventing the use of packaging. Or, due to a lack of available data, have all packaging placed on market net of reused packaging reduce by, say, 2% each year monitored by material type and sector.

**(c) To reduce litter and plastic pollution as well as conserving material resources:**

1. Introduce DRS reuse schemes for food containers, take-away wrappers, beverage cups, plastic beverage stirrers, plastic cutlery and the like.
2. Collect all plastics separately under consistency regulations. Mandate local sorting and reporting of non-recyclable plastics for disposal.
3. Set tougher goals and hard dates for the UK Plastic Pact led by WRAP with legislation as a backstop.
4. Extend the plastic packaging tax to all single-use packaging.
5. Set definitions for unnecessary packaging and remove unnecessary packaging from the market either voluntarily or using modulation or bans.
6. Create consumer resource councils (groups of local volunteer consumers) to investigate the barriers to reuse and waste reduction in the context of everyday life.
- E. Publish reports at least twice per year including the scale of resource production and consumption from raw and secondary materials and consumer resource councils' feedback.