AIPOLG
Agencies' and Industry Packaging Operational Liaison Group
1st December 2009
Telecon

Attendees

***Industry*: A Hawkes, A Doran, S Miles, P Gaffney**

***EA*: S Stocks, C Grove, C Chambers, R Scarpello**

***SEPA*: N Chalamanda**

***NIEA*: E Kelly**

***DEFRA*: R Rawlings**

Apologies:

P McKell, S Gough

1. Q3 Metrics

1.1. Packaging Reprocessing & Export UK Data

1.1.1. Reprocessing down 10% on 2008

1.1.2. Exporting up 21% on 2008

1.1.3. Combined Reprocessing & Export up 1%

1.1.4. Notable changes

Reprocess		
Aluminium	↑	65%
Steel	↓	64%
Paper	↓	20%
Wood	↓	10%

Export		
Steel	↑	59%
Glass	↑	20%
Plastic	↑	20%
Paper	↑	18%

1.2. UK Obligation Data

1.2.1. Negligible change remaining at 6.8M tonnes.

2. EA Q3 Activity

2.1. EA Packaging Reprocessing & Exporter Desktop Monitoring

2.1.1. Desktop monitoring of reprocessor & exporter quarterly and annual trends analysed. Apparent anomolies identified at 42 sites and investigation confirmed reasonable explanations in all cases. Example reasoning included:

Increased export business due to market benefits

New plant/business expansion

Steel – Incinerator Bottom Ash protocol backdating

2.1.2. Steel reprocessors and exporters. Analysis of steel evidence being issued in 2009 v 2008 by reprocessors and exporters has been undertaken to check for any significant variances so that reasons why can be understood and ensure confidence in evidence being made available.

2.2. EA 2010 Accreditation of Reprocessors and Exporters

2.2.1. Current applications received

reprocessors = 140 applications v 154 accreditations in 2009

exporters = 86 applications v 170 accreditations in 2009

(not unusual at this time of year. We often see incremental increase throughout the accreditation year. It could also be that one application results in several accreditations)

Once applications are accredited we will analyse accreditation capacity by material

2.3. EA Packaging Producer Desktop Monitoring

2.3.1. Continue to monitor joiners & leavers and evaluated negligible impact on UK Obligation

Joiners = 24,885T Leavers = 14,832T

2.3.2. Continue to monitor resubmissions and look for significant changes. 250 data forms amended in Q3 resulting in UK Obligation equilibrium.

2.3.3. Continue to investigate Public Register drop-offs. We are still investigating 82 out of the original 553 companies who failed to register in April 2009 despite being registered in 2008. These companies represent 24,201T of potential missed obligation.

Action: Investigate repeated offenders from previous 2 years to verify threshold accuracy. **PRRS**

2.3.4. Forward look – we will monitor large producers and progress in obtaining evidence v obligation as the compliance year comes to a close.

2.4. EA Packaging Compliance Scheme Monitoring (Desktop & Site Based)

2.4.1. Continue to monitor Scheme progress in meeting its obligation and assess status versus Operational Plans. In Quarter 2 we made further enquiry with 18 schemes, 16 of which were able to give reasons for not purchasing in line with procurement plans. Example reasoning included:

Lower obligation than forecast

Metals evidence purchased earlier than planned diverting resource from other materials

Delays in evidence being issued by reprocessors/exporters

Renegotiation of contracts

2.4.2. At the end of Q3, 11/23 schemes were not purchasing in line with procurement plans. Revised operational plans have not been requested at this stage of the year but reasons have been requested in order we can evaluate risk of non-compliance.

2.4.3. Scheme risk profiling in NPWD being tested and modified after functionality development in 2008. The 3 new schemes are coming out as priority for site based compliance monitoring. 2 have been visited already with benefit given to the scheme and regulator as result of meeting early in their operation. Once risk profiling has been sanity checked for existing schemes, we will plan further visits for 2010.

2.4.4. Forward look – we will monitor schemes progress in obtaining evidence v obligation as the compliance year comes to a close.

3. SEPA Activity

3.1. Schemes – all planned audits completed

3.2. Increased number of exporters now totaling 16 and number of reprocessors now totaling 15.

3.3. Focus on public register drop-offs

3.4. Day to day active monitoring of producers and schemes

4. NIEA Activity

4.1. Monitoring plan on track

4.1.1. 50 producer audits

4.1.2. 20 public register drop-offs

4.1.3. Freerider visits

4.1.4. 6 Schemes

4.1.5. Reprocessors & Exporters

5. Packaging Compliance Scheme Code of Practice (CoP)

5.1. **Action:** Scheme comments to be compiled and input to revised CoP

R Rawlings to CGrove/A Hawkes

5.2. **Action:** Final revision to be presented at the ACP meeting late Dec **R Rawlings/A Hawkes**

5.3. **Action:** CoP to be incorporated into Agencies Operational Plan guidance in December

C Grove

5.4. Action: New Schemes in 2010 to be made aware of CoP **DEFRA/Agencies**

5.5. **Action:** Feedback from schemes to be obtained at Feb ACP Scheme Event **A Hawkes**

5.6. **Action:** Agencies to feedback on uptake and quality after operational plan assessment in Feb/Mar 2010, trial in 2010 risk profile criteria and collate outcomes **Agencies**

6. Technical Issues

6.1. Metals: 100% packaging declarations as discussed at recent ACP Metals Task Force meeting. For example, some companies declare only 95% of steel cans purchased. Would be useful to agree how any change in procedure will be enacted. **Action:** Agencies to confirm position on recovery, recycling & contamination levels by end of Dec. **C Grove**

6.2. Suspicion of missed obligation arising from imports. Import of filled products eg. Drinks & wine in particular. 52% of obligation could be missed where importer handover to retailer arises and retailer not aware 'legally obligated' **Action:** Details to be shared for further consideration by agencies **Agencies**

7. Outstanding Actions from 10th September Meeting

7.1. Scheme compliance monitoring of procurement plans variance criteria for further investigation is now 10% and/or 100,000T.

7.2. **Ongoing:** ACP Scheme Event to be considered for early February 2010 with focus on what the regulation amendments consultation means operationally. **A Hawkes**

7.3. **Ongoing**: Data Providers/Obligation Calculators reports for DHL and Valpak on outcomes of review to be collated **N Chalamanda/P McKell**

7.4. **Ongoing:** Overview report to ACP and Industry on outcomes of trial exercise

N Chalamanda/P McKell

7.5. **Ongoing:** Agencies to consider how to build into routine monitoring **Agencies**

7.6. Quarterly reporting to commence at Q3 desktop monitoring round. SEPA and NIEA copy letters of producer visit outcomes to schemes. **Action:** EA to review approach to enable consistency with NIEA and SEPA **C Grove**

8. 2010 Meeting Dates

8.1. 23rd June hosted by Novelis (Warrington)

8.2. 8th December telcon

9. AOB