

AIPOLG
Agencies' and Industry Packaging Operations Liaison Group
Hosted by SEPA at Edinburgh Conference Centre
3rd June 2008

Industry: Phil Conran, Steve Gough, Andrew Green, Peter Gaffney, Jim Devlin

SEPA: Patrick McKell, Yvonne Brewerton

EHSNI: Eugene Kelly, Daniel Mulholland

EA: Bernie Carr, Sue Stocks, Chris Gove, Carly Chambers

1. Last Meeting Actions

- Data cleansing of NPWD still ongoing, Solution 7 currently working on this with SEPA. **PMcKell**
- Mechanism to capture wider industry views. Valpak to plan an industry open day for ACP at Stratford which could be extended to cover AIPOLG activities. **SGough**
- Compliance monitoring plan response from DEFRA not received –to follow up with Ian Atkinson. **PConran**

2. Position on NPWD development programme in relation to IR

- D Clark is currently leading on IR Programme. Continuing with enhanced programme for medium term (2/3 years) then reviewing. WEEE/Batteries/Plastic will not be going into same system. Currently looking into functionality required and carrying out a gap analysis using NPWD as the benchmark.
- PConran commented that it should be a priority that industry should be involved in WEEE system at early stage. Bob Mead and **PMcKell** to interact with industry through WEEE Advisory Board (WAB). **PMcKell**
- Email Bob Mead and PMCK regarding requirements for IT system – data subgroup to discuss way forward – general view is that there should be a similar waste recording system for WEEE as there currently is for Packaging. **PConran**
- Request update from Julian Turner regarding gap analysis for new WEEE IT System. **PMckell**
- Enhancements for NPWD are currently work in progress – the entire list may not be funded and needs to be prioritised with regard to budget available. Report back to industry. **BCarr**
- SGough has authorised Solution 7 to liaise with account manager regarding the Valpak reporting enhancements.

3. Finalised reprocessor quarterly reporting form.

- DEFRA quarterly report needs to be reviewed – industry would like to see a move towards waste recording information for all organisations and not just those who have submitted quarterly report information. Agencies commented that this would be possible and that a dynamic report could be run following the quarterly report deadline, however no queries could be taken for first 12 days following deadline to allow the data to be checked.
- SGough/PConran/Solution7/PMcKell/CChambers to have telecon to push dynamic report forward. Circulate dates for call. **PMcKell**

4. 2007 reprocessor/exporter PRN/PERN revenue reporting.

- Data is currently available, however still awaiting update from DEFRA before data can be made available to all. Share revenue report with industry for feedback prior to report being made public. **CChambers**
- PRN revenue should be spent on price support – however Agency Officers are not skilled as financial auditors to check this during routine audits. Guidelines could be provided by industry to assist with this during audits.

5. 2008 obligation data

- NPWD has improved data collection and therefore a review will take place of the current timetable for data – however for the time being the current timetable will still be followed. Industry requested obligation data one week after the 7th/15th deadlines – Agency need to check data prior to releasing data and suggested 1 month after data had been submitted, Agencies to discuss timelines going forward.
- Industry provided a list to the EA of those producers who had dropped off their registration – Chase up the progress of these companies. **CChambers**
- It was discussed that Schemes should not be registering producers until they receive their data.
- Following data cleansing in NPWD a producer report could be run using NPWD number to chase up those members who have not submitted data.

6. Technical Issues

- **GB-NI Registration Issues** - DMulholland circulated scenarios for registration regarding the 2 separate sets of regulations. Comments to DMulholland by end of w/c 9th June. Check data to calculate how many producers EHS would lose using the scenarios discussed. **DMulholland**
- **Bonded Warehouse** - Owner of product held in warehouse should be the obligated party. Need to clarify what an importer is the Regulations – to be discussed with DEFRA as a change to the Regulations would be required. EA Policy are drafting guidelines circulate to all. **CGrove**
- **Conversion & Packfill** - Regulatory change required to clarify this. Status quo should remain until then – ie, if packfill/conversion does not take place at the same time then both conversion and packfill obligations need to be picked up by producer. This was raised at the ACP and JC/PMcK agreed that the legal position – that companies only lose conversion obligation if packfill/conversion is done at the same time – is correct. To be discussed further via list of required changes to the Regulations (please see AOB)

7. Update on PCS response to publication of obligations

- Agencies commented that scheme obligation data should be made publicly available – currently at consultation stage between agencies/schemes. Objections which have been received have been referred to legal to confirm whether or not objections are substantial. Circulate response received from legal. **CChambers**
- Discussion took place regarding schemes present influencing other schemes to allow information to be released to stop constant FOI requests. Write to other schemes requesting that data is released. **PConran**

- CChambers /CGrove currently working on exercise on data requested – report should identify issues with data and the type of data which is requested. To be discussed at next meeting.
- Get back to schemes regarding FOI request for reprocessor data. **CGrove**
- Suggestion made that information could be placed on application forms regarding data entered onto form being made publicly available.

8. Agency auditing of data providers/obligation calculators

- Project team has been set up to look at auditing 3rd party data providers.
- Auditing will cover wider systems employed and methodology used – scope to focus on a number of producers to test methodology accuracy. 3 stage questionnaire scoping out methodology, looking at weights data and checking individual obligations.
- Schemes to feedback to agencies to help with project.
- Agencies to undertake project regarding weights to verify data.
- Suggestion to change application form to ask members where data has been derived from.
- Protocols to be audited
- Update on this project to be provided at next meeting in September
- Suggestion that location of audits for producers and schemes could perhaps be included in registration – telecom to be set up to discuss this in more detail.

9. Revised data SLA

- Covered in item 5.

10. PCS Code of Practice and risk profiling

- Agencies keen to explore COP for schemes to work to. Circulate code of practice document electronically to all. Comments to CG by June 25th. **CGrove**
- Schemes to discuss COP and risk profiling at next Valpak event

11. Stakeholder engagement for all PR regimes

- It was agreed that separate arrangements for each PR regime would be best, however work needs to be done on how we engage those involved within the different regimes.
- Agreement that cross-agency/industry body is required for input on WEEE. CGrove looking into this and comments taken on board for similar group to discuss WEEE issues.
- It was agreed that there is the need to improve data management processes with regard to WEEE and that quick wins were required.
- Need to provide common set of guidance between schemes and AATFs/AE's.
- Requirement of single group to progress day to day issues of operating legislation. Agencies to feedback on best way forward.

12. Publication of Minutes

- It was agreed that meetings should be made transparent and notes should be published on ACP pages – contact DEFRA to request that minutes are published. **PConran**
- Key points from meetings to be published in newsletter or front page of NPWD.
- Channel for issues to be raised at the meetings – initially through ACP.
- It was agreed that visitors could attend meetings on an ad-hoc basis following approval from the AIPOLG Chair.

13. AOB

- List of required changes to regulations to be shared between agencies/industry – everyone to circulate current lists of requirements to group. Telecom to be arranged to discuss agencies list of requirements which will then be compiled with industries. CGrove to be point of contact for lists of requirements.
- PGaffney raised issue of acknowledgement from EA regarding compliance with obligations. SEPA currently send out separate letter to all schemes confirming this. CC to check if NPWD currently notifies schemes that compliance has been met. Send copy of letter to DM/CC. **PMcKell**
- Check with Rob Scarpello that everyone met obligations for 2007 and feedback to PC. **CChambers**
- Confirm times of flights for next meeting to AG to allow AG to confirm timings of next meeting. **DMulholland/EKelly**

14. Next Meeting

- 3rd September – BPI Heanor, Derbyshire – times to be confirmed.

Agenda Items for next meeting

Conversion/Packfill update

Data exercise currently being worked on by CChambers/CGrove

Data providers project update