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# **COUNCIL**

# **BULLETIN**

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**Issue Number 20/2019**  
**Friday, 24 May 2019**



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Compiled, designed and produced by  
Customer Services Directorate - Governance

Contact: Kim Partridge  
Telephone: 01992 564443

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*Epping Forest District Council*  
[www.eppingforestdc.gov.uk](http://www.eppingforestdc.gov.uk)



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## PART A - FORWARD DIARY

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### Key to abbreviations:

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<b>CC</b>	Council Chamber	<b>Cab Off</b>	Cabinet Office
<b>CR1</b>	Committee Room 1	<b>CONF</b>	Conference Room (1st floor)
<b>CR2</b>	Committee Room 2	<b>CH OFF</b>	Chairman of Council's Office
<b>MR</b>	Members' Room	<b>TR RM</b>	Training Room
<b>TBD</b>	To be decided	<b>HEM</b>	Hemnall Street Offices.
<b>TBN</b>	To be noted	<b>HH</b>	Homefield House
<b>TBC</b>	To be confirmed	<b>ESC</b>	Epping Sports Centre

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Other venues are shown in full.

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**Week One: 27 May 2019 – 1 Jun 2019**

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Monday 27 May		Bank Holiday	
Tuesday 28 May			
Wednesday 29 May	6.30pm 7.30pm	Briefing – Area Plans Sub-Committee South Area Planning Sub-Committee South	CR1 CC
Thursday 30 May	2.00pm	Member Training - Digital Leadership & Inclusion Workshop	CR1
Friday 31 May			
Saturday 1 June			
Sunday 2 Jun			

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**Week Two: 3 June 2019 – 9 June 2019**

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Monday 3 June	10.00am 2.00pm 6.00pm	Member Training - Chairmanship of Area Plans Sub-Committee Digital Roll Out Digital Roll Out	CR1 MR MR
Tuesday 4 June	10.00am 7.30pm	Licensing Sub-Committee Overview and Scrutiny Committee	CC CC
Wednesday 5 June	7.30pm	District Development Management Committee	CC
Thursday 6 June	9.00am	Member Training - Licensing	CC
Friday 7 June			
Saturday 8 June			
Sunday 9 June			

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**Week Three: 10 June 2019 – 16 June 2019**

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Monday 10 June			
Tuesday 11 June	2.00pm 7.00pm	Digital Roll Out Epping Forest Youth Council	MR CC
Wednesday 12 June	6.30pm 7.30pm	Briefing – Area Plans Sub-Committee East Area Planning Sub-Committee East	CR1 CC
Thursday 13 June	7.00pm	Cabinet	CC
Friday 14 June			
Saturday 15 June			
Sunday 16 June			

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**Week Four: 17 June 2019 – 23 June 2019**

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Monday 17 June			
Tuesday 18 June	7.00pm	Council Housebuilding Cabinet Committee	CC
Wednesday 19 June	2.30pm 6.30pm 7.30pm	Licensing Committee Briefing – Area Plans Sub-Committee East Area Planning Sub-Committee East	CC CR1 CC
Thursday 20 June	7.00pm	Finance and Performance Management Cabinet Committee	CC
Friday 21 June			
Saturday 22 June			
Sunday 23 June			

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## PART B - ESSENTIAL INFORMATION

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### **Committee Management System**

The members' extranet facility for the Modern.Gov system is available at:

<https://eppingforestextranet.moderngov.co.uk/extranet>

Members may wish to save this link on their computer or mobile devices. Queries concerning login and password details for the extranet should be addressed to the Democratic Services Manager.

### **Constitution**

The Council's Constitution is available at:

<https://rds.eppingforestdc.gov.uk/ieListMeetings.aspx?CId=638&Info=1>

Queries concerning the Constitution should be addressed to the Democratic Services Manager

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## **PART C - GENERAL INFORMATION**

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**1. EPPING FOREST COLLEGE - CHANGE OF DETAILS (Pages 11 - 12)**

Please see attached.

**2. DEFRA WASTE CONSULTATION REPLIES (Pages 13 - 46)**

The council has replied to the four DEFRA waste consultations that have now closed.

Please find attached the replies made.

(Further information: Kim Durrani or David Marsh ext 4889)

**3. MEMBER TRAINING REMINDER**

Please be reminded that we are holding the following training sessions;

3 June – 3pm ~ 5pm - Chairmanship of Area Plans Sub-Committees and District Development Committee

6 June – 9.30am ~ 5pm – Licensing

Would you kindly advise Kim Partridge if you will be attending.

(Further information: Kim Partridge ext 4443)

**4. CHAIRMAN'S DIARY**

None this week

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## LICENSING ACT 2003

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Please be advised that the Licensing Unit has received the following applications for New Premises Licence made under the Licensing Act 2003 for the premises below:

Applicant name: Vital Foods Ltd

Address of Premises: Wo Fat, 270-272 High Road, Loughton, Essex, IG10 1RB

Brief details of the natures of the application: New premises licence application. The application is for the following:

**The provision of recorded music** – Monday to Saturday 12:00 – 14:30 and 17:00 – 00:00 and Sunday 12:00 – 23:30

**Late night refreshment** – Monday to Saturday 23:00 - 24:00 Sunday 23:00 – 23:30

**Supply of Alcohol** – Monday to Saturday 12:00 – 14:30 and 17:00 – 00:00 and Sunday 12:00 – 23:30

**Hours Premises Are Open To The Public-** Monday to Saturday 12:00 – 14:30 and 17:00 – 00:00 and Sunday 12:00 – 23:30

Consultation Period From: 18<sup>th</sup> May 2019 to 14<sup>th</sup> June 2019

Officer in charge: Mrs Denise Bastick

Please ensure that any comments/objections are received by the Licensing team on or before the consultation end date.

Manager  
Licensing Compliance Officer  
Licensing Officer

Kim Tuckey 01992 564034  
Sarah Moran 01992 564270  
Debbie Houghton 01992 564336  
Handan Ibrahim 01992 564153  
Denise Bastick 01992 564334  
Joanne Owen 01992 56 4721  
Jane Mullinger 01992 564461

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## PLANNING

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### 1. Appeals Lodged

EPF/0174/19 – 84 Lushes Road Loughton Essex IG10 3QB - Loft conversion including a new dormer extension to front and rear roof slopes including Juliet balcony to rear – Muhammed Rahman ext. 4415 – Householder appeal

EPF/0181/19 – 92 Alderton Hall Lane Loughton Essex IG10 3HD - Loft conversion with dormer extensions to front and rear roof slopes including Juliet balcony to rear – Muhammed Rahman ext. 4415 -Householder appeal

### 2. Forthcoming Planning Inquiries/Hearings -

None this week

### 3. Enforcement Appeals

None this week

### 4. Appeal Decisions

EPF/1441/18 – King Harolds Head Nazeing common Nazeing EN9 2RY - First floor extension to form residential flat and ground floor extension to replace store for restaurant use – Dismissed

EPF/1583/18 – 1 Buttercross Lane Epping Essex CM16 5AA - Demolish existing house and replace with 9 apartments – Dismissed

EPF/1710/18 – Ridge House Hoe Lane Nazeing Essex EN9 2RJ - Demolition of existing two storey detached dwelling and erection of four new detached houses- Dismissed

### 5. Tree Preservation Orders

None this week

### 6. S106 Agreements

None this week

### 7. Changes to Planning Systems

None this week

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## PROPOSED PLANNING ENFORCEMENT ACTION

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None this week

It is important to note, that when enforcement action has been authorised, this includes any subsequent action under Part VII of the Town and Country Planning Act 1990, including a prosecution or an injunction.

Principal Planning Enforcement Officer	Jerry Godden	01992 564498
Senior Enforcement Officer	Clare Munday	01992 564114
Planning Enforcement Officers	Sharon Hart	01992 564113
	Jim Gordon	01992 564530
	Zara Seelig	01992 564379
	Mick Mooney	01992 564713
Compliance Officer	Shannon Murphy	01992 564217

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## **PORTFOLIO HOLDER DECISIONS**

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The notification of decisions taken by individual Portfolio Holders is no longer included in the Council Bulletin.

All members of the Council receive automatic email notification of the publication of each individual Portfolio Holder decision and the call-in period for each decision commences immediately. Members wishing to call-in a decision should complete the attached call-in form and return it to Democratic Services before the expiry of five working days following the publication date of the decision. Members should refer to the Constitution (Article 6 - Overview and Scrutiny) for the rules of call-in.

Group Principal & CEO Gery McDonald



4<sup>th</sup> February 2019

Dear Supplier,

### **CHANGE OF DETAILS**

Over the past two years Tower Hamlets, Hackney, Redbridge and Epping Forest Colleges have merged to form New City College. As part of the merger process we have combined and moved the Finance team to a single site and have implemented a new accounting system.

Please update your records to ensure invoices are raised to New City College, at the following address:

New City College  
Finance Department  
New City College  
Falkirk Street  
London N1 6HQ

All invoices must be sent to [finance.invoices@nccLondon.ac.uk](mailto:finance.invoices@nccLondon.ac.uk)

Our new telephone number is 020 7613 9000.

### **IMPORTANT INFORMATION**

Following the merger, New City College is moving to a 'No PO, No Pay' policy which means that without a valid Purchase Order issued by the College, payment of supplier invoices will not be made.

All suppliers of goods and / or services should only accept a verbal or written order when a Purchase Order number is provided by a member of staff from the College. Purchase Order numbers should be provided before the goods and / or services are received.

If the goods and / or services have already been provided to the College, and you have not received a Purchase Order you must contact the member of staff who gave the original instruction to supply the goods / services and ask them to provide a valid Purchase Order number.

Once a supplier has received their Purchase Order, they will be able to quote the number on their invoice, and submit this to the College for payment. All invoices must quote an official

**TOWER HAMLETS CAMPUS  
POPLAR**  
📍 Poplar High Street  
London E14 0AF  
☎ 020 7510 7510

**TOWER HAMLETS CAMPUS  
ARBOUR SQUARE**  
📍 Arbor Square  
London E1 0PT  
☎ 020 7510 7510

**HACKNEY CAMPUS**  
📍 Falkirk Street  
London N1 6HQ  
☎ 020 7613 9000

**REDBRIDGE CAMPUS  
CHADWELL HEATH**  
📍 Chadwell Heath Lane  
Chadwell Heath, London RM4 4XT  
☎ 020 8548 7402

**REDBRIDGE CAMPUS  
ILFORD**  
📍 Pilemalling House  
25 Balfour Road, Ward IG1 4HP  
☎ 020 8506 8311

**EPHING FOREST CAMPUS**  
📍 Bordon Lane  
Loughton, Essex IG10 3SA  
☎ 020 8477 0200

**TOWER HAMLETS & HACKNEY PRINCIPAL**  
Alison Arnold

**REDBRIDGE & EPHING FOREST PRINCIPAL**  
Janet Smith

College Purchase Order number. Any invoices which are received without a valid Purchase Order will be returned to the supplier with a request to reissue quoting the Purchase Order number.

All invoices must be sent to [finance.invoices@nccLondon.ac.uk](mailto:finance.invoices@nccLondon.ac.uk).

If you have any questions regarding either of the above issues, please contact us on 020 7613 9000.

Yours faithfully,



Jamie Stroud  
Group Director of Finance  
New City College Group

E [jamie.stroud@nccLondon.ac.uk](mailto:jamie.stroud@nccLondon.ac.uk)  
T 0207 613 9374

Submitted to **Consultation on Consistency in Household and Business Recycling Collections in England**  
Submitted on 2019-05-13 16:39:10

## Introduction

### 1 Would you like your response to be confidential?

No

### 2 What is your name?

**Name:**  
Q Durrani

### 3 What is your email address?

**Email:**  
qdurrani@eppingforestdc.gov.uk

### 4 What is your organisation?

**Please provide further comments :**  
local authority

**What is the name of your organisation? Or if you chose 'other' above please provide details.:**  
Epping Forest District Council

## Proposal 1:

### 5 Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

Agree – local authorities should be required to collect a core set of materials

### 6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

Agree

#### **Please provide further comments :**

Subject to the collection of core materials being fully funded with no additional cost to Waste Collection Authority. Also, subject to contractual arrangements and potential required changes to fleet.

### 7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

#### **what are the barriers that local authorities face when collecting recycling from flats or houses of multiple occupancy:**

Lack of storage space, planning requirements, participation, contamination, fly tipping issues, resistance of property agents.

Resistance to separating waste.

### 8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

#### **Please provide further comments :**

Lack of storage space, planning requirements, participation, contamination, fly tipping issues, resistance of property agents.

Resistance to separating waste.

### 9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals

#### **Please provide further comments :**

We consider the principle of having a consistent set of materials could have a positive impact on recycling targets.

Planning requirements for new developments need to ensure adequate storage provision is made for the range of materials which will be collected. Compliance with design standards where they exist. Retro-fitting can be time consuming and costly. Managing agents need to be obligated to ensure full range of materials can be presented for collection.

## Proposal 2

**10 Do you believe that all of these core materials should be included or any excluded?**

**Do you believe these core materials should be included or excluded - glass bottles and containers:**

Should be included in the core set

**Do you believe these core materials should be included or excluded - paper and cardboard:**

Should be included in the core set

**Do you believe these core materials should be included or excluded - plastic bottles:**

Should be included in the core set

**Do you believe these core materials should be included or excluded - plastic pots, tubs and trays:**

Should be included in the core set

**Do you believe these core materials should be included or excluded - steel and aluminium tins and cans:**

Should be included in the core set

**11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?**

**tick - food and drinks cartons:**

Should be included in the core set

**tick - plastic bags and film:**

Should be included in the core set but phased in

**12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.**

**Please provide further comments :**

Inclusion should be subject to market demand/value of the material.

**13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?**

**Please provide further comments :**

Black plastic trays - once technological improvements enable them to be recycled. The necessary infrastructure needs to be in place and there needs to be market demand for the materials being collected.

**14 Do you have any other comments to make about Proposal 2?**

**Please provide further comments :**

Encourage investment in local processing infrastructure links with the aspirations of the Circular Economy Package. Reassurance is required that there will be enough confidence in the local recycling market for businesses to develop and expand to meet the local market. This includes sorting infrastructure as well as this can sometimes be a barrier to viable end markets.

### **Proposal 3**

**15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?**

Yes

**16 Do you believe that the proposed conditions a) b) c) and d) above are needed order to add a core material?**

Yes -but would also add some (please specify in box below)

**Please provide further comments :**

N/A

**17 Do you have any other comments to make about Proposal 3?**

**Please provide further comments :**

It is imperative that local authorities are funded in full for any additional costs associated with an expansion to the core set of materials that they are required to collect.

### **Proposal 4**

**18 Which aspects of the proposal do you agree and disagree with?**

**tick - a least a weekly collection of food waste:**

Agree

**tick - a separate collection of food waste (i.e not mixed with garden waste):**

Agree

**tick - services to be changed only as and when contracts allow:**

Agree

**tick - providing free caddy liners to householders for food waste collections:**

Agree

**19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats?**

Yes - please provide further details in the box below

**Please provide further comments :**

Yes in the vast majority of cases it should be practical to provide a separate food waste collection but there are likely to be a small number which are hard to access, have limited storage, no front or rear gardens etc.

**20 Do you have any other comments to make about Proposal 4?**

**Please provide further comments :**

See 19 above. With regard to 18 (3) above, implementation could potentially be subject to vehicle replacement programme. ECC to include something on IAA funding to support food waste collections.

## **Proposal 5**

**21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)**

I am not responding on behalf of a local authority

**22 Do you have any other comments to make about Proposal 5?**

**Please provide further comments :**

We question the statement in the consultation, "where a weekly food waste collection is provided, our analysis assumes that weekly collection of dry recycling will also be provided as well". We offer a fortnightly dry recycling service and moving to a weekly service would mean significant costs. We would suggest costs Impact Assessment.

## **Proposal 6**

**23 What are your views on this proposal?**

**Please provide further comments :**

Agreed as an interim arrangement provided that it does not delay implementation of separate food and garden waste collections.

## **Proposal 7**

**24 Which aspects of the proposal do you agree or disagree with?**

**tick - (i) a free garden waste collection for all households with gardens:**

Agree

**tick - (ii) A capacity to 240l (bin or other container eg sack):**

Agree

**tick - (iii) A fortnightly collection frequency (available at least through the growing season):**

Agree

**tick - (iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement:**

Agree

**tick - (v) this new requirement to start from 2023 (subject to funding and waste contracts):**

Agree

**25 Do you have any other comments to make about Proposal 7?**

**Please provide further comments :**

Local authorities should retain the ability to decide whether they wish to charge on foot, size of bin, frequency of collection, etc. Waste composition analysis

undertaken by Essex County Council has not found a significant amount of food waste in residual waste stream. In any case all residual waste in Essex goes to MBT not landfill. Proposals to offer free service is contrary to polluter pays principle. Where authorities have introduced charging for garden waste, purchase of home compost bins has gone up, home composting being the most environmentally sustainable way of dealing with garden waste. We are considering feasibility of introducing a charge for garden waste collection and would like reassurance that we will be fully compensated for any loss of income as a consequence of having to provide a free garden waste service. With regard to 24 (5) as well as contractual arrangements implementation will need to have regard to vehicle replacement schedules. Conversely if more local authorities go down the route of charging for garden waste collections it could lead to more bonfires and increased air pollution/statutory nuisance.

## **Proposal 8**

**26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?**

Yes

**27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.**

**Please provide further comments :**

Whole system costs need to be taken into account along with environmental impact e.g. traffic etc. May not be feasible for some isolated properties. Considerable investment in terms of capital and revenue costs would be required for us to deliver separate collection of the core materials. Source segregated services can require additional depot and transfer station requirements to accommodate the higher frequency tipping required. Source segregated materials require significantly more manual handling than our existing twin stream comingled single kerbside bin and therefore takes longer. This can cause greater congestion on busy routes. Flats and HMO's with limited storage capacity for waste bins may not have enough space to provide receptacles for multiple waste streams. Risk of contamination of these waste streams is also high.

**28 Do you have any other comments to make about Proposal 8?**

**Please provide further comments :**

If the DRS proposal is approved this could potentially impact on local authority waste streams, both in terms of quality and quantity.

## **Proposal 9**

**29 Do you agree or disagree with this proposal?**

Agree - bin colours should be standardised for all waste streams

**30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?**

Phased approach 2 - as and when old/unserviceable bins are replaced

**Please provide further comments :**

N/A

**31 Do you have any other comments about Proposal 9?**

**Please provide further comments :**

If a single collection system was introduced, linking packaging labelling e.g. blue dot to bin colours e.g. blue bin would help make recycling easier and increase participation and capture rates. Refer to WRAP guidelines.

## **Proposal 10**

**32 Do you agree or disagree with the proposal to publish statutory guidance?**

Agree - government should publish statutory guidance

**33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?**

Disagree - it should be less often

**34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week. Do you agree or disagree with this proposal?**

Disagree - it should be less often

**35 Do you have any other comments to make about Proposal 10?**

**Please provide further comments :**

WCAs should retain the ability to determine frequency of collection for residual waste, with the ability to move to three weekly collections if they so wish. Less frequent residual waste collections increases recycling performance.

**Proposal 11**

**36 Do you have any comments to make about Proposal 11?**

**Please provide further comments :**

WRAP should focus on communications and less on research. It will need to do more in order to embed the consistency/standardised service message nationally.

**37 What information do householders and members of the public need to help them recycle better?**

**Please provide further comments :**

Message needs to be simple, e.g. bin colours and packaging, improved labelling.

**Proposal 12**

**38 Do you agree or disagree with this proposal?**

Agree – government should work with local authorities and other stakeholders on this

**39 Do you have any other comments to make about Proposal 12?**

**Please provide further comments :**

Simplicity is important. Utilise information obtained via Waste Dataflow, i.e. build on existing information rather than ask WDA/WCAs to provide more data. Extend reporting requirement to MRF operators so that materials can be tracked to end destination.

**Proposal 13**

**40 Please use this space to briefly explain any comments you have on this proposal.**

**Please provide further comments :**

Reduce reliance on export markets, develop UK (and European) markets. Need to ensure collection regime delivers high quality recycling.

**Proposal 14**

**41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?**

Agree

**Please provide further comments :**

N/A

**42 Do you agree or disagree that the proposed indicators are appropriate?**

Agree

**Please provide further comments :**

N/A

**43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?**

**Please provide further comments :**

Too much emphasis on recycling not enough on waste minimisation. Indicators will end up being presented as a league table. It is not clear what the purpose of these performance indicators is, e.g. comparisons with other local authorities, looking at trends over time within an authority. Strategy wants to move away from weight based targets but if carbon savings are to be measured this can only be done if materials are collected separately and are not comingled.

**Proposal 15**

**44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?**

Agree

**Please provide further comments :**

**45 Do you agree that these alternatives should sit alongside current weight-based metrics**

Agree

**Please provide further comments :**

N/A

**46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?**

**Please provide further comments :**

Carbon could possibly use the Scottish Carbon matrix. Cost should also have regard to local demographics.

## **Proposal 16**

**47 Do you agree that greater partnership working between authorities will lead to improved waste management and higher levels of recycling?**

Agree

**Please provide further comments :**

N/A

**48 What are the key barriers to greater partnership working?**

**Please provide further comments :**

Too many vested interests, sovereignty, elected members. Different collection regimes. Contractual agreements, in-house versus outsourced services.

**49 How might Government help overcome these barriers?**

**Please provide further comments :**

The Inter Authority Agreement has provided certainty regarding tonnages and the funding mechanism agreed by the Essex Waste Partnership has enabled all WCAs to introduce weekly food waste collection services. Sharing of experience has helped implementation of new schemes and also encourage some authorities to move to alternate weekly residual collections. Legislation would help to overcome some of the barriers faced along with transparency around whole system costs. Funding needs to incentivise WCAs to recycle more.

**50 Do you have any other comments to make about Proposal 16?**

**Please provide further comments :**

Local Authorities and Local Partnerships have done a great deal of work in this area and are already delivering successful partnership to achieve efficiency gains.

## **Proposal 17**

**51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?**

Agree

**Please provide further comments :**

N/A

**52 Which of the 3 options do you favour?**

Option 3 mixed dry recycling, separate glass recycling, separate food recycling

**Please provide further comments :**

N/A

**53 We would expect businesses to be able to segregate waste for recycling in all circumstances but we are interested in views on where this may not be practicable for technical, environmental or economic reasons**

Yes – it should be practicable to segregate waste for recycling in all circumstances

**Please provide further comments :**

Yes but in a small number of instances there may be limited storage which makes this difficult.

Not sure/no opinion/not applicable.

**54 Should some businesses, public sector premises or other organisations be exempt from the requirement?**

No

**Please provide further comments :**

N/A

**55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?**

**Please provide further comments :**

Businesses already have a number of environmental responsibilities which they struggle to meet. Infrastructure needs to be put in place to support them and to help them do the right thing!! Trade waste charges for recyclables should be cheaper than disposing of residual waste, so it should make good business sense for them to separate their waste.

### **Proposal 18**

**56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?**

Agree

**Please provide further comments :**

N/A

**57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?**

Disagree (please explain in the box below)

**Please provide further comments :**

The target cannot be by weight but needs to be a % of the total weight disposed of - this will stop the distortion of collection data as a target on weight and may lead to some organisations not meeting the minimum threshold as they do not produce that level of waste.

**58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?**

**Please provide further comments :**

No comment

**59 Do you have any views on how we should define 'food-producing' businesses?**

**Please provide further comments :**

Have regard to definition of food business in Food Hygiene legislation.

**60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?**

No

**Please provide further comments :**

N/A

**61 Do you have any other comments to make about Proposal 18?**

**Please provide further comments :**

Needs to be properly funded, who will enforce the requirements?

### **Proposal 19**

**62 What are your views on the options proposed to reduced costs?**

**Please provide further comments :**

Potential for RCHs to accept commercial waste.

**63 Are there other ways to reduce the cost burden that we have overlooked?**

**Please provide further comments :**

No comment.

**64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?**

**Please provide further comments :**

Utilise WRAP for advice to businesses.

**Proposal 20**

**65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?**

Agree

**Please provide further comments :**

N/A

**66 Do you have any other comment on Proposal 20?**

**Please provide further comments :**

No comment.

## Response ID ANON-JZGE-SN8A-A

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**  
Submitted on 2019-05-12 20:29:48

### Introduction

**1 Would you like your response to be confidential?**

No

If you answered 'Yes' above, please give your reason: :

**2 What is your name?**

**Name:**

Q Durrani

**3 What is your email address?**

**Email:**

qduurrani@eppingforestdc.gov.uk

**4 Please provide information about the organisation/business you represent**

**Which of the following best describes you?:**

Local Authority

If you answered 'other' above, please provide details:

**What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):**

Epping Forest District council

**What is the approximate number of staff in your organisation? (if applicable):**

**5 Please provide any further information about your organisation or business activities that you think might help us put your answers in context.**

**Please answer below:**

N/A

**6 Does your organisation have any recent experience of a DRS or related schemes? If so, can you please briefly explain your experiences?**

**Please answer below:**

N/A

**7 Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?**

Yes

### Background

#### Our approach

**8 Do you agree with the basic principles for a DRS?**

Yes

**Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view:**

Providing all 8 principles followed

**9 Should the following materials be in scope of a DRS?**

**Type of material included - PET bottles:**

Yes

**Type of material included - HDPE bottles:**

Yes

**Type of material included - Aluminium cans:**

Yes

**Type of material included - Steel cans:**

Yes

**Type of material included - Glass bottles:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**10 Should the following materials be in scope of a DRS?**

**Materials in-scope - Cartons e.g. Tetrapacks:**

Yes

**Materials in-scope - Pouches and sachets e.g. energy gels:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**11 If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Subject to there being an environmental benefit in doing so

**12 Should the following drinks be in scope of a DRS?**

**Should drinks be included? - Water:**

Yes (some)

**Should drinks be included? - Soft drinks (excluding juices):**

Yes (some)

**Should drinks be included? - Juices (fruit and vegetable):**

Yes (some)

**Should drinks be included? - Alcoholic drinks:**

Yes (all)

**Should drinks be included? - Milk containing drinks:**

Yes (all)

**Should drinks be included? - Plant based drinks (soya, rich almond and oat drinks):**

Yes (some)

**Should drinks be included? - Milk:**

Yes (some)

**Other (please state which)::**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**13 Do you think disposable cups should be in scope of a DRS?**

**Should disposable cups be included? - Disposable cups made from paper with a plastic lining (used for coffee):**

Yes

**Should disposable cups be included? - Disposable cups made of plastic (used in vending machines):**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The Government is particularly interested in any evidence on whether or not it would be practical or cost effective to include disposable cups in the scope of a DRS.:

**14 Do you agree with the proposed material flows as described?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**15 Do you agree with the proposed financial flows described?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

I don't know/further information required e.g. retailer handling fee, DMO operational arrangements, etc. Assuming there is a low level of unredeemed deposits the producer fee will need to be high to fund the DMO, this cost will be passed on to consumers. Volatility of recycling markets will impact on material revenue

**16 Should producers obligated under a DRS be:**

Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items

**Other (please explain):**

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

**17 If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?**

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

N/A

**18 Do you agree that the DMO should be responsible for meeting high collection targets set by Government?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

Yes, in order to ensure that robust infrastructure is in place to support the scheme.

**19 Should the DMO also be responsible for meeting high recycling targets set by government?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**20 Should unredeemed deposits be used to part-fund the costs of the DRS system?**

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**21 If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?**

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view :

they should be retained to further the objectives of the Resources and Waste Strategy

**22 Do you have alternative suggestions for where unredeemed deposits could be allocated?**

**Please explain your answer:**

To local authorities so they can fund improvements to their waste collection and waste disposal services. If not to a separate charity for environmental projects such as cleaner seas/costal erosion.

**23 If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:**

Industry (drinks producers)

**Other (please specify):**

a. Industry (drinks producers)? Yes

b. Government no

c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)? Yes

d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)? Yes

e. Other (please specify) WRAP/representative of local government yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**24 Should there be government involvement in the set-up/running of the DMO body?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Government should set the parameters and then leave it to the DMO implement.

**25 Do you agree with the government's proposals that a DMO would:**

**A DMO should: - Advise Government on setting of the deposit level/s:**

Yes

**A DMO should: - Set producer import fees:**

Yes

**A DMO should: - Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers:**

Yes

**A DMO should: - Set and distribute the handling fees for return points:**

Yes

**A DMO should: - Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?:**

Yes

**A DMO should: - Be responsible for maintenance of Reverse Vending Machines (RVMs) and provision of bags/containers to those running manual return points:**

Yes

**A DMO should: - Own the material returned by consumers:**

Yes

**A DMO should: - Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts:**

Yes

**A DMO should: - Fund counting sorting/centres – and manage the contracts for counting/sorting centres:**

Yes

**A DMO should: - Be legally responsible for meeting the high collection targets set by Government for drinks containers within scope of the DRS.:**

Yes

**A DMO should: - Measure and report recycling rates to Government:**

Yes

**A DMO should: - Run communications campaigns to aid consumer understanding of the DRS:**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

(d) Yes, but the handling fee must cover in full the cost to the retailer

(l) Yes, but campaigns would need to link with those run by LAs and WRAP

**26 Do you agree with our proposed definition of a producer?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**27 Should there be a de-minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

there should be a phased approach to implementation with larger producers joining the scheme first.

**28 Should a de-minimis be based on:**

**Should a de-minimus be based on: - Number of employees:**

**Should a de-minimus be based on: - Sales figures:**

**Should a de-minimus be based on: - Volume/ weight of drinks put on the market:**

Yes

**Should a de-minimus be based on: - None of these:**

**If yes, please provide more information (how many employees, what sales figure, what volume/ weight):**

No idea, best answered by producers

**Other (please specify):**

**29 If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?**

**Please provide more information:**

No

**30 In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO?**

**Do you agree with this proposal?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**31 Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMS and an IT system?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**32 Should producers of drinks within a DRS be responsible for DRS operational costs?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**33 Which of the following should be obligated to host a return point?**

**Other (please specify):**

All, where practicable to do so. - add warehouse distribution centres

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**34 What might the impacts be on those hosting:**

**(a) Reverse vending machines? Where available, please share evidence to support your view.:**

Space, potential fly tipping, maintenance issues, overflowing/full RVMS, frequency of emptying

**(b) Manual return points? Where available, please share evidence to support your view.:**

May work in some circumstances and locations

**35 Are there any Health and Safety-specific implications that may be associated with hosting return points?**

Yes

**Please provide more information:**

Additional staffing requirements, storage capacity/impact on retail space, need for regular emptying especially after B/H

**36 Is there a de minimis level under which businesses who sell drinks in scope should be exempt?:**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**37 Should a de-minimis be based on:**

**Other (please specify):**

Retailers best able to answer this question

**If yes, please provide more information (what floor size, what sales figure, how many employees):**

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**38 Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers?**

Please provide details.:

N/A

**39 For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?**

Please explain your answer:

Kerbside collection by local authorities

**40 What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?**

Please explain your answer:

Collection by companies delivering food ordered on line, libraries, council offices.

**41 Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?**

Please explain your answer:

Replace bring banks with RVMs

**42 Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?**

Not Answered

Please briefly state the reasons for your response. Where possible, please provide supporting information.:

Need to consider security, solar operated, space/congestion/queues at HHRCs, site where is there large footfall/popular events

**43 Should there be a de-minimis under which online retailers would not be obligated to pick up and refund DRS material?**

Yes

Please provide more information:

**44 If yes, should a de-minimis for online retailers be based on:**

Other (please specify):

Yes, retailers are best placed to comment on how this should be decided.

**45 Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.**

No

Please briefly state the reasons for your response. Where possible, please provide supporting information:

unless in scope containers taken off premises

**46 Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?**

Yes

Please briefly state the reasons for your response. Where possible, please provide supporting information. :

**47 Do you have any further views, comments or evidence in relation to retailers not already covered above?**

Please provide more information:

N/A

**48 How should a DRS account for 'on-trade' sites such as bars and restaurants?**

Please provide more information:

Businesses to pay the deposit which is redeemed when they return empty bottles

**49 What do you consider to be the optimum deposit level to incentivise return of drinks containers?**

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Deposit needs to be proportionate to the value of the item, needs to be sufficiently high to incentivise use of DRS

**50 Should the deposit level be a flat rate across all drinks containers covered by the DRS?**

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

should be proportionate to value of the material

**51 Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?**

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**52 How do you think deposits should be redeemed? Please tick all that apply.**

**Other (please state):**

All, whatever incentivises people to use the scheme.

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

**53 Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

**54 In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?**

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

**55 How do you think transparent financial flows in a DRS could be achieved most effectively?**

**Please explain you answer, providing evidence where available:**

On line viewable account

## **Monitoring and Enforcement**

**56 Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?**

No

**If no, why and is there another body that would be better suited to perform this function?:**

**Please explain your answer:**

**57 How frequently should the DMO be monitored? (This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))**

Not Answered

**Other (please specify):**

Risk based

**58 How often should producers be checked for compliance with the DRS (if compliance is obligated)?**

Not Answered

**Other (please specify):**

risk based

**59 Should enforcement focus on:**

Not Answered

**Other (please specify):**

**60 Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?**

Not Answered

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

No government to legislate and set fine levels

**61 Are there any points in the system which you think would be particularly susceptible to fraud?**

**Please state :**

Yes, manual return points, RVMs – security/accessibility, possibility of double counting

**62 Which labelling/markings on drinks containers in scope would best protect against fraud? Please select all that apply:**

**Other (please specify):**

manual return points, RVMs – security/accessibility, possibility of double counting

**Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems. :**

**63 How could return via Reverse Vending Machines (RVMs) best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions.:**

Non cash payments (phone or card) only so there is some traceability, although may not pass discrimination tests.

**64 How could the process of manual returns best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions. :**

Look at approaches adopted elsewhere.

**65 How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?**

**Please explain your answer:**

This would depend on what the differences are, where possible a uniform system should be adopted.

**DRS Options - 'all-in' and 'on-the-go'**

**66 Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?**

Not Answered

**Please state the reasons for your response. Where available, please share evidence to support your view:**

I don't know/I don't have enough information. It will depend on the scheme which is introduced.

**67 If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?**

Not Answered

**Other (please specify):**

Other, it will depend on the scheme

**Please state the reasons for your response. Where available, please share evidence to support your view:**

**68 Do you agree with our definition of 'on-the-go' as less than 750mls in size?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**69 Do you agree with our definition of 'on-the-go' as excluding multipack containers?**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of 'on-the-go'. Where available, please share evidence to support your view:**

**70 Based on the information, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised in this consultation) which is your preferred DRS option?**

Not Answered

**Please state the reasons for your response. Where available, please share evidence to support your view:**

Neither. Do not favour DRS as bureaucratic and expensive to operate and enforce. From a local authority point of view LAs will be left to collect all the hard to recycle/expensive to recycle materials. Concerns regarding environmental and transport issues given the large number of potential collection points. Too much overlap with extended producer responsibilities and the other consultations that are currently underway. The effectiveness of other initiatives such as standardised LA collections and extended producer responsibility should be assessed first before introduction of DRS is considered. It is doubtful that a DRS will reduce litter as those littering unlikely to go to the trouble of returning containers, and also additional litter could be produced if people start sorting through neighbours recycling boxes to remove containers which are in scope of the scheme so that they can claim the deposit.

## **Summary of approach to Impact Assessment**

**71 Do you agree with our impact assessment?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**72 Do you think more data is needed?**

Yes

**If yes, please state where:**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**73 Are there other costs and benefits which we have not covered in our impact assessment?**

Not Answered

**If yes, please provide further information:**

more info required

**74 Do you have further comments on our impact assessment?**

**Please be specific.:**

No

**75 The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives?**

**If so please briefly describe it, making reference to any available evidence:**

More funding to local authorities for more frequent litter clearance/more enforcement, provision of more litter bins and recycling banks. Also more funding for communications targeted at "recycling on the go".

**76 A potential option for introducing a DRS could be to start with the 'on-the-go' model, and then expand/phase roll-out to 'all-in'. Do you think this would be an effective way to introduce a DRS?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Yes, scheme should be piloted first and then phased in if the pilot proves successful.

## **Outcomes of what we are hoping to achieve**

**77 Do you think a DRS would help us to achieve these outcomes?**

**Do you think a DRS will help achieve these outcomes? - Reduction in litter and litter disamenity (include expected % decrease where possible):**

No

**Do you think a DRS will help achieve these outcomes? - More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go':**

Yes

**Do you think a DRS will help achieve these outcomes? - Higher quality recycling:**

Yes

**Do you think a DRS will help achieve these outcomes? - Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials:**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where possible, please share evidence to support your view:**

**78 Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

No, need to have regard to the other consultations which will potentially deliver greater benefits without the bureaucracy involved in implementing DRS scheme.

**79 Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?**

Yes

**Other (please state):**

enhanced LA collections/communications, extended producer responsibility, plastic tax

**Please explain your answer, providing evidence where available. :**

**80 Do you think an alternative approach would be a better way of achieving the outcomes?**

Yes

**Other (please state):**

enhanced LA collections/communications, extended producer responsibility, plastic tax

**Please explain your answer, providing evidence where available. :**

### **Further detailed questions**

**81 Are there particular local authority considerations that should be taken into account when considering whether to implement either an “all-in” or “on-the-go” model?**

**Please provide more information:**

Loss of income from material sales/LAs would need to be compensated, impact on MRF contracts, removal of material presented kerbside for collection to redeem deposit on in scope materials, potential increase in littering. Productivity – the number of properties that can be serviced per day rather than the tonnage collected is often the limiting factor. It should not be assumed that collections costs will reduce proportionately to reduction in amount of material collected.

**82 Are there specific considerations associated with your local authority that DRS policy makers should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response.:**

Nothing specific identified as this stage

**83 What benefits and/or disadvantages can a DRS provide to your local authority?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

Need further information but potentially environmental costs associated with transportation, impact on kerbside collections.

**84 Are there any specific considerations associated with local authorities that collect waste from designated DRS return points that we should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

None identified, further info required.

**85 How should a DRS drive better design of packaging? Please select all that apply:**

**Other (please specify):**

a and b

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**86 Who should be involved in informing and advising on the environmental cost of products? Select all that apply**

Government, Reprocessers, Producers

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**87 Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?**

Agree

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

**88 Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS?**

**Please specify.:**

None identified at this time.

**Further comments**

**89 Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?**

**Please specify.:**

The law on unintended consequences. Producers may start using alternative packaging material to be exempt from RDS requirements

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## Response ID ANON-RUME-U7PS-8

Submitted to **Plastic Packaging Tax (high-level consultation)**

Submitted on **2019-05-12 19:22:54**

### About you

#### 1 What is your name?

**Name:**

Q Durrani

#### 2 What is your email address?

**Email:**

qduurrani@eppingforestdc.gov.uk

#### 3 What is your organisation?

**Organisation:**

Epping Forest District Council

#### 4 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason::

#### 5 Please provide information about the organisation/business you represent

**Which of the following best describes you?:**

Local government

If you answered other, please provide details::

**What is the approximate number of staff in your organisation? (if applicable):**

### Plastic packaging within scope of the tax

#### 6 Do you agree with the government's suggested approach to defining plastic packaging in scope of the tax?

Not Answered

**Optional text box:**

Epping Forest District Council response to  
Consultation on Plastic Packaging Tax in England, Wales and Northern Ireland

It was felt that the questions posed in the consultation document would be more appropriately answered by packaging manufacturers. However, we are supportive in principle of any initiative which through a fiscal measure is more sustainable in the longer term and helps to drive an increase in recyclable plastics or other material.

We are unable to comment on whether the proposed 30% threshold is sufficiently challenging or practical to achieve at this time.

There is concern that as an unintended consequence of the plastics tax that manufacturers may try to avoid the tax by switching to other non-recyclable packaging materials which may end up as a recycling payment scheme

### Driving recycled content

#### 7 Are there any environmental or technical reasons to consider excluding any particular ways of recycling plastic?

Not Answered

**Optional text box:**

#### 8 Do you agree with the government's suggested approach to defining recycled content for the purposes of the tax?

Not Answered

**Optional text box:**

#### 9 Do you agree with a 30% threshold for recycled content and why?

Not Answered

Optional text box:

### **Liability for the tax**

**10 Do you agree with the government's proposal that the tax at import should only apply to unfilled packaging? If not, what would the effects be? What alternative would you prefer and how would it work?**

Not Answered

Optional text box:

### **Ensuring compliance**

**11 Is the government's suggested approach to compliance proportionate and appropriate?**

Not Answered

Optional text box:

### **Assessment of other impacts**

**12 Unless already covered in your responses to other questions within this document, is there anything else you would like us to note about the impact of the tax, especially any potentially adverse impacts on groups with protected characteristics?**

Not Answered

### **Next steps**

## Response ID ANON-N7RC-R74N-5

Submitted to **Consultation on reforming the UK packaging producer responsibility system**  
Submitted on 2019-05-13 14:03:17

### About You

#### 1 What is your name?

**Name:**  
Q Durrani

#### 2 What is your email address?

**Email:**  
qdurrani@eppingforestdc.gov.uk

#### 3 Please provide information about the organisation/business you represent

**Which of the following best describes you?:**  
Local government

**What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):**  
district council

**What is the approximate number of staff in your organisation? (if applicable):**

If you answered 'Other' above, please provide details::

#### 4 Please provide any further information about your organisation or business activities that you think might help us put your answers in context.

Please answer below:

#### 5 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason::

### Background

#### 6 Do you agree with the principles proposed for packaging EPR?

Yes

**Please briefly state the reasons for your response. Specifically, if you respond No, please identify which principles you do not agree with and explain why.:**  
N/A

#### 7 Do you agree with the outcomes that a packaging EPR should contribute to?

Yes

**If you answered No, please state which outcomes you do not agree with.:**  
N/A

#### 8 Do you think these types of items not currently legally considered as packaging should be in scope of the new packaging EPR system?

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

#### 9 Which of these two classifications best fits with how your business categorises packaging?

Neither

**If neither, please say why, and provide a description of how your business categorises packaging:**

**10 Do you agree with our definition of full net cost recovery?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

n/a

**11 Do you agree that producers should be required to fund the costs of collecting and managing household and household-like packaging waste? (i.e. all consumer facing packaging)**

Yes

**If No, please briefly state the reasons for your response and state what waste you think full net cost recovery should apply to.:**

This is in line with the polluter pays principle and would move the burden from local authorities, where it currently predominantly sits, to the producers.

**12 Do you agree that packaging for commercial/industrial applications should be out of scope for full net cost recovery?**

Yes

**If No, please briefly state the reasons for your response.:**

**13 We would welcome your views on whether or not producers subject to any DRS should also be obligated a under a packaging EPR system for the same packaging items.**

Yes they should

**Please briefly state the reasons for your response.:**

DRS should not be introduced until EPR has been fully implemented and the benefits realised.

**Part A: 2. Driving better design of packaging**

**14 Do you agree with the development of an 'approved list' of recyclable packaging to underpin the setting of either modulated fee rates or deposits?**

I neither agree nor disagree

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**15 Do you think the payment of modulated fees or the payment of deposits with the prospect of losing some or all of the deposit would be more effective in changing producers' choices towards the use of easy to recycle packaging?**

I don't know / I don't have enough information

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**16 Do you think there could be any unintended consequences in terms of packaging design and use arising from:**

**Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Modulated fees:**

I don't know / I don't have enough information

**Do you think there could be any unintended consequences in terms of packaging design and use arising from: - Deposit (for recyclable packaging) and fee (for non-recyclable packaging):**

I don't know / I don't have enough information

**Please briefly state the reasons for your response and provide any information to support your view.:**

Industry could move from solid packaging to plastic air bubble packaging - companies need to develop moulded lightweight cardboard packaging.

**17 Do you agree that the deposit approach should be designed to incentivise more closed loop recycling?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**Part A: 3. Obligated producers**

**18 What do you consider to be the most appropriate approach to a single point of compliance, the Brand-owner or the Seller approach?**

Brand-owner

**Please briefly state the reasons for your response and provide any information to support your view.:**

The brand owner approach would be cheaper to administer as there would be less businesses, also the brand owner has a greater influence over packaging design than a seller has.

**19 If a single point of compliance approach was adopted, do you think the de-minimis should be:**

Don't know

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**20 Should small cafés and restaurants selling takeaway food and drinks whose packaging is disposed 'on the go' be exempt from being obligated?**

No

**Please briefly state the reasons for your response and provide any information to support your view:**

N/A

**21 If shared responsibility is retained, is Option A or Option B preferable for including smaller businesses or the packaging they handle in the system?**

Option A (Lower or remove the de-minimis)

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**22 If you have stated a preference for A, do you think the de-minimis threshold should:**

Be removed entirely

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**23 Overall, do you have a preference for maintaining a shared responsibility compliance approach, or moving to a single point of compliance?**

Single point of compliance

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**24 Do you have a preference for how small businesses could comply?**

Other

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't mind provided the funding raised is sufficient to cover the costs in full.

**25 Do you think that requiring operators of online marketplaces to take the legal responsibility for the packaging on products for which they facilitate the import would be effective in capturing more of the packaging that is brought into the UK through e-commerce sales?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

#### **Part A: 4. Supporting improved collections and infrastructure**

**26 Do you agree that payments to local authorities for collecting and managing household packaging waste should be based on:**

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - provision of collection services that meet any minimum standard requirements (by nation):**

Yes

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - quantity and quality of target packaging materials collected for recycling:**

No

**Do you agree payments to local authorities for collecting and managing household packaging waste should be based on: - cost of managing household packaging waste in residual waste:**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

(a) to include cost of collecting and disposing of packaging waste in residual waste

**27 Do you think we have considered all of the costs to local authorities of managing packaging waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

Transportation fuel costs or vehicle replacement funding.

**28 Do you agree with our approach to making payments for the collection of household-like packaging waste for recycling?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

(a) Yes but need also to take on board geographic costs, i.e. travelling costs to transfer stations, treatment facilities etc.

**29 Should businesses producing household-like packaging receive a payment for the costs of household-like packaging waste in residual waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view:**

N/A

**30 Are there other factors, including unintended consequences that should be considered in determining payments to:**

**Local authorities? Please explain the reasons for your response and provide any information to support your view:**

(a) Management and administration of the system

**For the collection and recycling of household-like packaging waste? Please explain the reasons for your response and provide any information to support your view:**

(b) Management and administration of the system

**31 Do you have any information that would help us to establish the costs incurred by local authorities and other organisations of cleaning up littered and fly-tipped packaging items?**

**Please provide any information below:**

Breakdown of costs available for mechanical sweeping, litter picking and disposal.

Dumped commercial waste needs to be included.

**32 How do you think producer fees could be used to improve the management of packaging waste generated on-the-go?**

**Please answer below:**

Colour coding of packaging to make recycling easier to do. Communications campaigns, enhanced provision of litter/recycling bins.

**33 Do you have any information that would help us to establish the costs of collection and disposal of increased on-the-go provision?**

**Please answer below:**

More information would be required. Whilst some authorities have info on cost of emptying litter bins, more info is required in respect of the cost of picking up litter off the ground and the disposal cost for "on the go" litter.

**34 Do you agree that provision for the take back of single-use disposable cups for recycling should continue to be developed a voluntary basis by business prior to a government decision on whether disposable cups are included under an EPR scheme or DRS?**

No

**Please briefly state the reasons for your response and provide any information to support your view:**

It would be at odds with producer responsibility being implemented thoroughly in other areas of packaging not to include it here as well. EPR should be applied to disposable cups. Given that disposable cups are often consumed on the go they can easily end up as litter and so are a cost burden on local authorities.

**35 Do you think the recycling of single-use disposable cups would be better managed through a DRS or EPR scheme?**

EPR

**Please briefly state the reasons for your response and provide any information to support your view:**

N/A

**36 Do you think a recycling target should be set for single-use disposable cups?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

No, the emphasis should be on reducing the number of disposable cups used rather than the % recycled. If there is a recycling set, then the necessary infrastructure needs to be in place to support it.

## **Part A: 5. Helping consumers do the right thing – communications and labelling**

**37 Should producer fees be used to support local service related communications delivered by local authorities?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

N/A

**38 Should producer fees be used to support nationally-led communications campaigns in each nation?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

N/A

**39 Are there any circumstances where producers should be exempt from contributing to the cost of communications campaigns?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

N/A

**40 Do you agree it should be mandatory for producers to label their packaging as Recyclable/Not Recyclable?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**41 Do you think that the percentage of recycled content should be stated on product packaging?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view:**

Encourages consumers to choose better products with higher recyclable contents.

**42 If you responded yes to the previous question, how could recycled content information be provided to consumers?**

**Please describe briefly.:**

% recyclable

**43 Do you have any other proposals for a labelling system?**

**Please describe briefly.:**

Keep it simple, colour coded.

**44 Do you have experience to suggest an appropriate lead-in time for businesses to incorporate any mandatory labelling requirements?**

**Please describe briefly.:**

N/A

## **Part B: 6. Packaging waste recycling targets to 2030**

**45 In your view, are the estimates made in the Material Flow reports for packaging waste arising the best available data?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view.:**

The estimates made in the Materials Flow reports probably are the best data set available for packaging. The fact they are estimates and have such a wide band of assumptions show that a great deal of work needs to be done in this area to establish robust and reliable data for packaging waste. Greater efforts should be made to take this area forward and the governments should be prepared to impose a system if business does not provide acceptable solutions to this issue in a responsible timeframe.

So whilst we believe it is the best available data it is not good enough as a data set on which to base future policy and so work must be done to have a much more robust data set.

**46 Are you aware of any other factors which may affect the estimates of packaging waste entering the waste stream?**

I don't know / I don't have enough information

**Please briefly state the reasons for your responses and provide any information to support your view.:**

N/A

**47 In your view, are there other factors which may affect the amounts of obligated tonnage reported?**

I don't know / I don't have enough information

**Please briefly state the reasons for your responses and provide any information to support your view.:**

N/A

**48 Do you agree with the packaging waste recycling targets proposed for 2025?**

No

**Please briefly state the reasons for your responses and provide any information to support your view:**

Needs to be more ambitious.

**49 Do you agree with the packaging waste recycling targets proposed for 2030?**

No

**Please briefly state the reasons for your responses and provide any information to support your view:**

Needs to be increased if 2025 target is raised to keep the same differential.

**50 Please provide your views on the policies and actions that could help us achieve an even higher overall packaging recycling rate, for example 75%, as well as your views on the costs associated with doing so.**

**Please answer below:**

It will be difficult to achieve within the timescale but to do so the policy will need to be bold, ambitious and properly funded.

**51 Do you foresee any issues with obtaining and managing nation specific data?**

No

**Please briefly state the reasons for your responses and provide any information to support your view.:**

(b) No but delays in auditing/publishing data diminish the worth of the data.

**52 Should a proportion of each material target be met by "closed loop" recycling, e.g. as is the case for glass recycling targets?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view.:**

N/A

**53 Should government set specific targets for individual formats of composite packaging?**

Yes

**If yes, what key categories of composite packaging should be considered?:**

N/A

**54 Do you agree with the proposed interim targets for 2021 and 2022 set out in Table 6?**

Yes

**Please briefly state the reasons for your responses and provide any information to support your view.:**

It is right that the recycling target for plastics is increased more.

**55 Do you agree with the proposal to increase the allocation method percentage to 35% for 2021 and 2022?**

I neither agree nor disagree

**Please briefly state the reasons for your responses and provide any information to support your view.:**

More info required.

**Part C: 7. Governance Models**

**56 Overall, which governance model for packaging EPR do you prefer?**

Model 1

**Please briefly explain your preference.:**

- (a) build on existing scheme
- (b) not really preferable
- (c) not really preferable
- (d) not really preferable

**57 If you had to modify any of the models in any way to make them better suited to achieve the principles and outcomes government has set for packaging EPR what changes would you suggest?**

**Please describe briefly.:**

Don't know.

**58 Do you have any concerns about the feasibility of implementing any of the proposed governance models?**

No

**If yes, please provide specific reasons and supporting information for each governance models that you have concerns about:**

Don't know.

**59 Do you think that any of the governance models better enable a UK-wide approach to packaging producer responsibility to be maintained whilst respecting devolved responsibilities?**

**Please describe briefly.:**

Don't know.

**60 Stakeholders have suggested that a compliance fee mechanism similar to the arrangements currently in place under the WEEE producer responsibility scheme should be introduced if a competitive evidence market continues to operate such as in Model 1. Do you agree?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**61 Should a Packaging Advisory Board be established to oversee the functioning of the EPR system and the compliance schemes in the competitive compliance scheme model 1 or do you think other arrangements should be put in place?**

Not Answered

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't know.

**62 Please let us know your thoughts as to whether the proposed single management organisation should be established on a not-for-profit basis or as a government Arm's Length Organisation.**

**Please answer below:**

Don't know.

**63 If such a management organisation is established as not-for-profit, one option is for government to invite proposals from potential operators and then issue a licence to operate for a defined period of time. Do you agree with this approach?**

No

**If no, would you like to suggest an alternative approach?:**

Don't know.

**64 Should a single scheme be established for household/household-like packaging and C&I packaging as described for model 2?**

I don't know / I don't have enough information

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't know.

**65 Or, should there be a separate system for managing compliance for household/household-like packaging and C&I packaging as described for model 3?**

No

**If yes: could model 3 work as described? Or would additional mechanisms be required to make this approach work effectively? Please indicate what these might be.:**

Don't know.

**If no: do you have suggestions for an alternative approach?:**

N/A

**66 Under model 4 are producers more likely to:**

Join a compliance scheme?

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't know.

### **Part C: 8. Responsible management of packaging waste domestically and globally**

**67 Do you agree that government should seek to ensure export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**68 Do you agree that measures identified here would help ensure the export of packaging waste is undertaken in a transparent and environmentally responsible manner?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**69 Have we missed potential measures that you believe need to be considered alongside those measures we have proposed?**

No

**If yes, please explain which potential measures should be considered.:**

N/A

**70 Do you have any concerns about the feasibility and / or costs of implementing any of the proposed measures?**

Yes

**If yes, please provide specific reasons and supporting information for each measure that you have concerns about:**

Yes, needs to be adequately enforced and funded.

### **Part C: 9. A more transparent system**

**71 Do you agree that accredited reprocessors and exporters should be required to report their financial information?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view. If you answered no, how would you suggest transparency is provided on how income from the sale of evidence has been used to support capacity building?:**

N/A

**72 Should accredited reprocessors and exporters be required to generate evidence for every tonne of packaging waste that they process?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**73 Should accredited reprocessors and exporters be required to report on the packaging waste they handle monthly?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**74 Do you think that any additional measures to those already described would be required to ensure transparent operating of the evidence market in model 4?**

I don't know

**If yes, please provide details:**

N/A

**75 Are there any additional requirements that should be placed on compliance schemes to ensure greater transparency of their operations and reporting?**

I don't know

**If Yes, please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**76 Under a reformed system do you think compliance schemes should continue to be approved by the existing regulators or do you think a different approach is required?**

Other

**Please explain below:**

Don't know, more info required.

**77 Are there any additional requirements of a single producer organisation to ensure transparency of its operation and reporting?**

I don't know

**If yes, please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**78 Do you think there is a need to make more information on packaging available to consumers?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

## **Part C: 10. Compliance monitoring and enforcement**

**79 Are there other datasets that will be required in order to monitor producers in any of the proposed models?**

No

**If yes please explain which datasets will be needed:**

N/A

**80 Is there a specific material, packaging type or industry sector whereby producing accurate data is an issue?**

Yes

**If yes, please provide further information on where producing accurate data may be an issue. :**

Polystyrene.

**81 Do you think a single database, as opposed to the current range of methodologies available, would be an effective alternative?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**82 Do you agree that compliance schemes (models 1 and 3), the producer management organisation (model 2) or the scheme administrator (model 4) should be responsible for carrying out audits of producers, which should be reportable to the regulators?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**83 Do you support the broadening of legally enforceable notices to obtain required information?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**84 Are there other enforcement mechanisms that should be considered which would be timely and effective to bring producers into compliance, for example in relation to free riders?**

No

**If yes, please explain which other enforcement mechanisms should be considered:**

Don't know.

**85 Are there any further data that should be required to be collated / collected via compliance schemes or a single management organisation?**

**Please provide brief details.:**

Don't know

**86 Do you think a penalty charge, as described, is the correct lever to ensure packaging recycling targets are met?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

(a) Yes, subject to it incentivising compliance

**87 Should stakeholders other than reprocessors or exporters be able to issue evidence of recycling?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

Yes, provided doesn't result in double counting. System needs to be properly regulated and accountable.

**88 Are there any additional enforcement powers that should be applied to waste sorters, MRFs and transfer stations handling packaging waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't know.

**89 Do you agree with the proposed amendments to enforcement powers relating to reprocessors and exporters?**

Yes

**Please briefly state the reasons for your response and provide any information to support your view.:**

N/A

**90 Do you have any evidence to indicate that under any of the proposed governance models the likelihood of waste packaging being imported and claimed as UK packaging waste might increase?**

No

**If yes, please provide information on any evidence you have:**

N/A

**91 Is the current requirement for a sampling and inspection plan and subsequent auditing by the regulator sufficient to address any misclassification of imported packaging waste?**

No

**Please briefly state the reasons for your response and provide any information to support your view.:**

Don't know.

**92 Are there other mechanisms that could be considered that would prevent imported UK packaging waste being claimed as UK packaging waste under the proposed governance models?**

No

**If yes, please explain which other mechanisms could prevent imported packaging waste being claimed as UK packaging waste:**

Don't know.

## 11. Estimated costs and benefits

93 Do you have any additional data or information that will help us to further assess the costs and benefits (monetised or non-monetised) that these reforms will have?

Please answer below:

No

94 Do you have further comments on our impact assessment, including the evidence, data and assumptions used? Please be specific.

Please answer below:

No

## 12. Further comments

95 If you have any other views or evidence that you think we should be considering when reforming the packaging waste regulations, which you have not yet shared, please add them here.

Please answer below:

No further comments to add.

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## EPPING FOREST DISTRICT COUNCIL

### Notification of Call-In of Portfolio Holder Decision under Paragraphs 45-52 of Article 6 (Overview & Scrutiny) of the Constitution

*This form must be signed and completed and the original returned to the Proper Officer in person no later than the fifth working day following the publication of the decision to be called-in*

<b>Decision to be called-in:</b>
<b>Decision reference:</b>
<b>Portfolio:</b>
<b>Description of decision:</b>
<b>Reason for call-in</b>

**Members requesting call-in**  
(3 members of the Overview and Scrutiny Committee or 5 other members)

Members Name:	Signed:
<b>Lead member:</b>	
Office Use Only: Date Received:	

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