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2 June 2021

Dear Co-ordinator

## **ADEPT CONSULTATION RESPONSE TO EXTENDED PRODUCER RESPONSIBILITY FOR PACKAGING (EPR)**

### **About ADEPT**

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary and metropolitan authorities, along with Directors of Local Enterprise Partnerships and corporate partners drawn from key service sectors. ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK. We deliver the projects that are key to unlocking broader economic success and creating more resilient communities, economies and infrastructure.

ADEPT Waste Group members have welcomed the opportunity to be extensively involved in round table and other forums where many of the issues have been explored with stakeholders.

ADEPT welcomes the consultation on EPR as a positive step towards moving towards a circular economy and reducing the carbon footprint of managing resources. The proposals will help bring clarity to the public around what can be recycled which should help meet the targets that have been set for the core materials as well as move us closer to the 65% by 2035. Producers will be encouraged to reduce both their packaging as well as make it easier to recycle through meeting the full net costs of both managing their packaging as well as modulated fees to encourage better packaging design. Local Authorities welcome these proposals.

### **More clarity on the payment mechanism and value is required for Local Authorities to take fundamental service decisions**

The details of how full net costs are to be assessed are unclear in the consultation. Local Authorities will receive full net costs only if they have effective & efficient systems in place that meet both quality and quantity standards when benchmarked against their peers. ADEPT would welcome the opportunity to be involved in this work further to gain a better understanding and help inform the development of the proposals. Funding will flow through the Scheme Administrator but it is unclear how this will impact on the Spending Review and future Local Government settlements. Budgets will need to be set and hence Local Authorities will need certainty around funding. ADEPT would suggest that an annual fixed payment is made to each Local Authority by the Scheme Administrator and then a variable payment to reflect actual performance. This would help with budget planning.

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### **Local Government role is essential to good Scheme Administrator governance**

The role and performance of the Scheme Administrator is critical to the success of the implementation of the EPR scheme. Appointment and management of this body through a contract will need to ensure that the key outcomes are clearly set out, the contract is robust with a performance management framework in place to ensure that it delivers what is required. The proposed relationship between Local Authorities and the Scheme Administrator is not as close as we would like given our important role in the value chain. ADEPT would suggest that a Local Authority representative should be part of the governance arrangements such that our interests are represented fairly. In addition we would welcome being involved in the development of the procurement process given our experience of procuring large scale contracts and the expertise that we feel that we could bring along with ensuring that our interests are met. We understand that the Scheme Administrator will be a large national organisation but our regional areas are very different and hence it would be helpful if there could be a sense of place recognising that one size will not fit all.

### **Investing in communicating system change to consumers/ residents and businesses**


The consultation gives little detail around the consumer and how these changes will be communicated to them. Encouraging maximum participation in recycling by the resident and reducing contamination will be critical to reaching the targets that have been set. We are optimistic that the producers will help with communications to residents and this is one area where collaboration across the value chain will be essential. Local Authorities have a good track record of communicating with their residents but this does require funding.

### **Funding the transition prior to 2023**

Local Authorities will need to start planning now for the changes that will need to be made to services to meet the proposed timescale including communication with residents prior to 2023. Waste budgets have been cut year on year with many Local Authorities reducing or losing their waste communications teams as a result. Investment will be required to reverse this trend but there is little detail around transition funding prior to 2023. New Burden funding is suggested for waste compositional analysis but there will be other costs prior to 2023 that will need to be met if the scheme is to be successfully rolled out from 2023. ADEPT would welcome clarity on how the transition period will be funded.

ADEPT welcomes these proposals and looks forward to working closely with Government to develop them further prior to implementation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Palfrey', with a long horizontal flourish extending to the right.

**Steve Palfrey**

Chair of ADEPT Waste Group/

Assistant Director, Waste & Environment, Suffolk County Council