

# Consultation on Extended Producer Responsibility for Packaging

It is important to note that Questions 19-23 in Defra's on-line response 'citizen space' are actually within Annex 1 of the Consultation document itself and numbered Q101-104 so all questions from number 19 onwards do not match the consultation document. **The number highlighted in yellow cross references the consultation document.**

The CTPA response has been developed to best reflect a consensus view from membership.

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## What we want to achieve: packaging waste recycling targets

**6. Do you agree or disagree with the proposed framework for setting packaging targets?**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*For cosmetics and personal care products, packaging has an essential function in protecting the contents from spoiling and therefore protecting the consumer and enabling the consumer to safely store and use the product over time. Cosmetic product packaging must also be labelled with specific legally required information, including a list of ingredients and, where necessary, how to use the product safely.*

*The UK cosmetic and personal care industry is a responsible industry which is fully committed to reducing its environmental impact. Wherever possible, the industry will innovate and adapt in order to use packaging with a lower environmental impact. In principle, CTPA agrees that producers should recognise the cost of management of their waste; they are often able to influence its design to reduce packaging, improve its recyclability and communicate with their consumers to encourage good disposal habits.*

*However, the achievement of recycling targets is not just in the hands of producers. It is important that any system engages local authorities, handling facilities and reprocessors to focus on the best outcomes for waste as it moves through the value-chain. Consistency in collections and investment in infrastructure is required to enhance the quantity and quality of recycling to encourage a more truly circular economy. The entire value chain must be mobilised in this process and consumer awareness improved.*

*Although CTPA agrees in principle to the introduction of targets to incentivise adoption of re-fillable and re-usable packaging models, this is not always an option owing to necessarily stringent, regulated, hygiene, safety, and practical considerations for cosmetic products.*

*CTPA would welcome further engagement with the Government to discuss the specific challenges facing the cosmetics and personal care products industry.*

**17. Do you agree or disagree that there may be a need for 'closed loop' recycling targets for plastics, in addition to the Plastics Packaging Tax?**

- Agree  
 Disagree  
 Neither agree nor disagree

Please provide the reason for your response.

*Cosmetic and personal care producers are keen to use recycled and recyclable materials wherever possible taking into consideration safety implications, however recycling to an equivalent application/grade is not guaranteed, particularly for plastics, owing to impurities and gradual technical degradation and depends on the type of recycling (chemical or mechanical recycling process).*

*To ensure the safety of consumers, as with sectors such as food and drink, there is a fundamental safety requirement under the Cosmetics Regulation for each cosmetic product to undergo a safety assessment performed by a duly qualified professional before it is placed on the market. This rigorous evaluation includes the relevant characteristics of packaging material, in particular purity (including analysis for prohibited substances), stability and any potential interaction between packaging and product during the proposed life of the product (including the potential for prohibited substances to leach from packaging to the product). However, the strict safety requirements necessary for cosmetics and personal care products and packaging mean that the detailed composition of the packaging must be known and so in some cases, recycled packaging cannot be used.*

*Proposed reforms under Extended Producer Responsibility should develop the market for recovered and recycled materials. The success of this will impact on the case for closed loop schemes*

**19. Which of the definitions listed below most accurately defines reusable packaging that could be applied to possible future reuse/refill targets or obligations in regulations? **Q101 from the annex in the consultation document****

Further information to help answer this question (and the 4 that follow) can be found in Annex 1 of the consultation document.

- Definition in The Packaging (Essential Requirements) 2015  
 Definition in The Packaging and Packaging Waste Directive (PPWD)  
 Definition adopted by The UK Plastic Pact/The Ellen MacArthur Foundation  
 None of the above

If you selected 'none of the above', please provide the reason for your response, including any suggestions of alternative definitions for us to consider.

*The definition under The Packaging (Essential Requirements) 2015 covers the essence of the approach more comprehensively covered within the UK Plastic Pact/The Ellen MacArthur Foundation.*

**20. Do you have any views on any of the listed approaches, or any alternative approaches, for setting reuse and refill targets and obligations? Please provide evidence where possible to support your views. Q102 from the annex in the consultation document**

Please answer here.

*Adjusting recycling targets to account for reusable packaging is sensible as recycling ultimately should reduce as other preferential routes are chosen.*

*With respect to any target needing to capture packaging that is being re-used, companies can collate data to reflect the number of refills or ancillary products sold vs original refillable containers.*

*There are many examples of consumer-owned models for cosmetic products, however, rather than the consumer being responsible for cleaning, they are more likely to involve the use of ancillary products such as make-up godets or pans sold for insertion in a reusable compact or lightweight pot of cream to insert in a more sturdy, decorated, reusable outer jar.*

*It is imperative that Government departments communicate to align parallel legislation to ensure cohesive policies and understanding of applicable safety standards and responsibilities to sustainable initiatives such as refill and reuse models.*

*Under the UK Cosmetics Regulation, specific requirements ensure safety, manufacturing and labelling requirements are understood and met. Recognising the risks that refill/reuse models could present, CTPA has developed guidance to explain the key considerations to members, particularly around product safety, manufacture, retail and labelling requirements.*

*It would be difficult to mandate a certain percentage of packaging that all producers place on the market be refillable/reusable for the following reasons:*

- Owing to hygiene and safety requirements, refill/reuse models are not always appropriate. This would be the case for certain cosmetic products. Businesses should not feel obliged to create unsuitable refill/reuse models.*
- Businesses within the supply chain, such as salons or retailers, may find it difficult to understand their roles and their responsibilities under the UK Cosmetics Regulation obligations that follow the product.*
- Refill/reuse initiatives may affect the safety of the product and as a consequence, the consumer. Formulations may be adjusted to counter any potential risk of contamination, leading to an undesirable increased level of preservatives. Professional use products often differ in the concentration of active substances and usage instructions, so to decant such products for home-use could, therefore, be prohibited.*
- Refill/reuse might not work for more seasonal products, such as sunscreen products, when considering the storage of a container over the winter and the hygiene and consumer safety implications of this.*
- Packaging conceived, designed, and marketed to be refilled or reused, may not end up being used for the same purpose for which it was conceived. This option should not be discouraged.*

- *It should be considered whether reuse/refill models distort the market towards recognised, well-established brands. Such models represent a significant investment, from companies to facilitate the refilling and consumers to ‘buy into’ the brand for successive refills. Consumers should be free to try new products and refill/reuse might limit the consumer’s appetite to try a product.*
- *Ultimately, businesses should consider refill and re-use wherever it can be done safely and without increasing the overall impact of the product as reuse comes above recycling in the waste hierarchy.*

**21. Do you agree or disagree that the Scheme Administrator should proactively fund the development and commercialisation of reuse systems? Q103 from the annex in the consultation document**

- Agree  
 Disagree  
 Neither agree nor disagree

Please provide the reason for your response.

*Many companies are already funding commercial models. As it is not necessarily applicable to all products/sectors, this may set up resentment with those obligated producers funding it for other producers not necessarily being able to benefit. However, ultimately, funding should be used to encourage reuse as it is higher in the waste hierarchy than recycling.*

**22. Do you agree or disagree that the Scheme Administrator should look to use modulated fees to incentivise the adoption of reuse and refill packaging systems? Q104 from the annex in the consultation document**

- Agree  
 Disagree  
 Neither agree nor disagree

Please provide the reason for your response.

As in CTPA’s response to Q22, refill/reuse models are not applicable for all sectors or products. *Where appropriate, such models should be encouraged, however, there is already an in-built benefit to develop refill/reuse models as obligated producers should only pay for the initial container going on the market. The recyclability of any ancillary products should be considered and the fees moderated in accordance with this.*

## Producer obligations for full net cost payments and reporting

**23. Do you agree or disagree that Brand Owners are best placed to respond effectively and quickly to incentives that are provided through the scheme? Q19**

- Agree  
 Disagree

Neither agree nor disagree

*CTPA believes that in many cases brand owners can exert a strong influence over packaging design, however, smaller producers are often reliant on standard designs and are not necessarily in a position to influence packaging design, not being able to fund custom tooling of components.*

*It should be noted that behavioural change is not always entirely achievable when there are some products for which packaging composition is subject to statutory requirements.*

*As mentioned in CTPA's response to Q6, the achievement of recycling targets is not just in the hands of producers. It is important that any system engages local authorities, handling facilities and reprocessors to focus on the best outcomes for waste as it moves through the value-chain.*

**25. Of Options 2 and 3, which do you think would be most effective at both capturing more packaging in the system and ensuring the smallest businesses are protected from excessive burden? Q21**

- Option 2
- Option 3
- Neither possibly but need some arguments
- Don't know

If you answered 'neither', please provide the reason for your response and describe any suggestions for alternative approaches to small businesses.

*Unless there is alignment between the Packaging Extended Producer Responsibility de-minimis and other Government policies such as the Plastic Packaging Tax, there could already be confusion and additional administrative burden for all producers.*

*The cost of handling and recycling packaging from producers that fall below the de minimis will be passed on to larger obligated producers. The system should spread the projected costs of the system across industry, reducing the burden for all.*

**26. If either Option 2 or 3 is implemented, do you consider there to be a strong case to also reduce the de-minimis threshold as set out in Option 1? Q22**

- Yes
- No
- Unsure

Please provide the reason for your response.

*Referencing CTPA's response to Q25, the cost of handling and recycling packaging from producers that fall below the de minimis will be passed on to larger obligated producers. The system should spread the projected costs of the system across industry, reducing the burden for all.*

*For Extended Producer Responsibility to work, it really need everyone involved, no matter what size company for consumers to understand and adapt to the necessary.*

**27. Do you think that Online Marketplaces should be obligated for unfilled packaging in addition to filled packaging? Q23**

- Yes
- No
- Unsure

If you answered 'yes', please provide the reason for your response.

*Obligations for on-line marketplaces should mirror the regulatory obligations of any other producer or importer. The packaging sold via online marketplaces should be caught by UK producers who fill and sell the products and are therefore obligated.*

**28. Do you foresee any issues with Online Marketplaces not being obligated for packaging sold through their platforms by UK-based businesses? Q24**

- Yes
- No
- Unsure

If you answered 'yes', please provide the reason for your response.

*Without obligations for on-line marketplaces mirroring the regulatory obligations of any other packaging supplier or importer, there is distortion in the market. Online marketplaces would have to understand if their sellers met the de minimis threshold and if not, require them to declare their packaging data*

## **Modulated fees, labelling and plastic films recycling**

**34. Do you think that the proposed strategic frameworks will result in a fair and effective system to modulate producer fees being established? Q30**

- Yes
- No
- Unsure

If you answered 'no' please provide the reason for your response, being specific with your answer where possible.

*The effectiveness of modulated producer fees will take time to judge. CTPA agrees with the principle of packaging fee modulation to recognise that improving design for recyclability or refill/reuse is of benefit to producers.*

*Producers should be made aware of the system of modulated producer fees well in advance of the implementation of EPR to allow time for any redesign of packaging they would like to make. Recyclability should be forward-looking; the framework for assessing what is widely and easily recyclable and what is not, must be easy to understand and adapt to new handling and reprocessing infrastructure and packaging, to not stifle innovation.*

*Owing to the diverse nature of packaging for cosmetic and personal care products, it might be difficult to categorise packaging. It is important that a 'miscellaneous or other' category has fair and appropriate fees according to recyclability.*

**35. Do you agree or disagree that the Scheme Administrator should decide what measures should be taken to adjust fees if a producer has been unable to self-assess, or provides inaccurate information? This is in addition to any enforcement that might be undertaken by the regulators. Q31**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*Whilst CTPA considers that smaller producers may not have the understanding of recycling and reprocessing to assess fees, the responsibility should lie with them and their suppliers to have assessed the recyclability of their packaging or obtain 3<sup>rd</sup> party verification of the recyclability of their packaging. Advice should be provided in the first option rather than more stringent enforcement.*

*Whilst it may be ultimately necessary, requiring the Scheme Administrator to assess packaging for some but not others will be a cost borne by the rest of the obligated producers.*

**36. Do you agree or disagree with our preferred approach (Option 1) to implementing mandatory labelling? Q32**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*There is already confusion around what different recycling symbols mean. Mandatory, consistent and simple (recycle/do not recycle) labelling should be present on all packaging so that consumers have no barrier to making the right recycling decision.*

**37. Do you agree or disagree with the proposal that all producers could be required to use the same 'do not recycle' label? Q33**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*As per CTPA's response to Q36, mandatory consistent and simple (recycle/do not recycle) labelling should be present on all packaging so that consumers have no barrier to making the right recycling decision.*

**38. Do you think that the timescales proposed provide sufficient time to implement the new labelling requirements? Q34**

- Yes
- No
- Unsure

If you answered 'no' please provide the reason for your response.

*Current labelling is not empowering the consumer to make informed decisions about recycling, therefore the change to consistent, simple (recycle/do not recycle) labelling should be made as soon as practicable to enhance collection rates and improve the quality of material collected.*

*It will cause additional confusion for consumers to change any scheme once implemented, therefore, to maximise the benefit from recycling behavioural change, any change and communication around it, should be right-first-time.*

*It will take time for all obligated producers to register with the labelling scheme; develop the label artwork and be audited.*

**39. Do you agree or disagree that the labelling requirement should be placed on businesses who sell unfilled packaging directly to small businesses? Q35**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*There could potentially be an instance where the content determines the recyclability, perhaps owing to toxicity, so some unfilled packaging may not be able to be labelled until the contents are determined.*

**40. Do you think it would be useful to have enhancements on labels, such as including 'in the UK' and making them digitally enabled? Q36**

- Yes
- No
- Unsure

If you answered 'yes', please state what enhancements would be useful.

*Whilst digital labelling would provide additional benefits, if, when disposing of a product, a consumer needed to check the recyclability of a product with an app or on-line, this would not add to the simplicity of recycling.*

*'In the UK' would help producers who label for different markets ensure that the claim is qualified.*

**43. Do you agree or disagree that there should be an exemption from the ‘do not recycle’ label for biodegradable/compostable packaging that is filled and consumed (and collected and taken to composting/anaerobic digestion facilities that accept it), in closed loop situations where reuse or recycling options are unavailable? Q39**

- Agree
- Disagree
- Neither agree nor disagree

Please provide the reason for your response.

*There is already confusion from citizens around what this means and its fate. More understanding of the ultimate fate of such materials is required. Whilst innovation must be encouraged, this must be matched by unified development of the competencies of the relevant infrastructure.*

*The consumer understanding of words such as biodegradable and compostable is not necessarily what producers intend. The claim could lead to more littering as consumers believe the packaging will decompose naturally.*

## Payments for managing packaging waste: necessary costs

**45. Do you agree or disagree with the proposed definition and scope of necessary costs? Q41**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please detail why and provide any costs you think should be included under the definition of necessary costs.

*There is the potential for necessary costs within scope to increase outside the control of producers given that there are a lot of unknowns such as the cost of legacy litter, or capital expenditure.*

## Payments for managing packaging waste from households

**46. Do you agree or disagree that payments should be based on good practice, efficient and effective system costs and relevant peer benchmarks? Q42**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please detail any issues you think there are with this approach and how you think payments should instead be calculated.

*In principle, costs borne by producers should represent cost-effective, efficient systems. Any system should be continually monitored to ensure satisfactory performance. As in CTPA's response to Q6, it is important that any system engages local authorities, handling facilities and reprocessors to focus on the best outcomes for waste as it moves through the value-chain. Consistency in collections and investment in infrastructure is required to enhance the quantity and quality of recycling to encourage a more truly circular economy.*

**51. Do you agree or disagree that there should be incentive adjustments or rewards to encourage local authorities to exceed their modelled recycling benchmarks? Q47**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please detail why you think incentive adjustments should not be applied to encourage local authorities to exceed their recycling performance benchmarks.

*As the association for the cosmetics and personal care products industry, CTPA is not able to comment on this matter. However, as in CTPA's response to Q6, it is important that any system engages local authorities, handling facilities and reprocessors to focus on the best outcomes for waste as it moves through the value-chain. Consistency in collections and investment in infrastructure is required to enhance the quantity and quality of recycling to encourage a more truly circular economy.*

## Payments for managing packaging waste from businesses

**55. Do you agree or disagree that there remains a strong rationale for making producers responsible for the costs of managing packaging waste produced by businesses? Q51**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*Whilst there may be opportunities to improve recycling rates by including household-like business packaging waste and smaller business waste producers of commercial and industrial packaging, the additional costs of this should not pass to the obligated producers.*

**56. Do you agree or disagree that all commercial and industrial packaging should be in scope of the producer payment requirements except where a producer has the necessary evidence that they have paid for its management directly? Q52**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*Larger businesses often already have systems in place to deal with their commercial and industrial packaging waste.*

**67. Do you agree or disagree that minimum output material quality standards should be set for sorted packaging materials at a material facility? Q63**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*It is important to note that there is a fundamental safety requirement under the Cosmetics Regulation for each cosmetic product to undergo a safety assessment performed by a duly qualified professional before it is placed on the market. The safety assessor looks at the individual ingredients, how they are used in the final product and whether the finished product is safe. This rigorous evaluation includes the relevant characteristics of packaging material, in particular purity (including analysis for prohibited substances), stability and any potential interaction between packaging and product during the proposed life of the product (including the potential for prohibited substances to leach from packaging to the product).*

*As a consequence of regulated consumer safety requirements and Government policies such as the Plastic Packaging Tax, there is an increasing requirement for high quality recyclate and the aim, ultimately, should be to ensure resources and infrastructure are in place to handle all the waste we produce, to recognise and maximise its value and ensures circularity of resources.*

**68. Do you agree or disagree that material facilities that undertake sorting prior to sending the material to a reprocessor or exporter should have to meet those minimum standards in addition to just assessing and reporting against them? Q64**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response.

*As per CTPA's response to Q67, it is important to note that there is a fundamental safety requirement under the Cosmetics Regulation for each cosmetic product to undergo a safety assessment performed by a duly qualified professional before it is placed on the market. The safety assessor looks at the individual ingredients, how they are used in the final product and whether the finished product is safe. This rigorous evaluation includes the relevant characteristics of packaging material, in particular purity (including analysis for prohibited substances), stability and any potential interaction between packaging and product during the proposed life of the product (including the potential for prohibited substances to leach from packaging to the product).*

*As a consequence of regulated consumer safety requirements and Government policies such as the Plastic Packaging Tax, there is an increasing requirement for high quality recyclate and the aim, ultimately, should be to ensure resources and infrastructure are in place to handle all the waste we produce, to recognise and maximise its value and ensures circularity of resources*

## Litter payments

**72. Do you agree or disagree that the costs of litter management should be borne by the producers of commonly littered items based on their prevalence in the litter waste stream as determined by a composition analysis which is described in option 2? Q68**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please provide the reason for your response and/or provide an alternative approach to litter management costs being based on a commonly littered basis.

*This would require further detail on how comprehensive any composition analysis is, its transparency and reliability. Littering is a criminal offence so the cost of a lack of enforcement action would be borne by the obligated producers.*

*Whilst CTPA would support additional funding for communication or enforcement, consumer behaviour is ultimately not in the direct control of producers, who should focus on the reduction of packaging.*

**73. In addition to local authorities, which of the following duty bodies do you agree should also receive full net cost payments for managing littered packaging? Please select all that apply. Q69**

- Other duty bodies
- Litter authorities
- Statutory undertakers
- None of the above
- Any other(s) - please specify

If you selected 'Any other(s)' - please specify here.

*Without knowing the specifics of each duty body, the important point to stress is that the scheme administrator, including obligated producers, would need oversight of any organisation managing litter in addition to local authorities.*

**74. Do you agree or disagree that producers should contribute to the costs of litter prevention and management activities on other land? Q70**

- Agree
- Disagree

Neither agree nor disagree

If you disagree, please provide the reason for your response.

*Littering is a criminal offence so the cost of a lack of enforcement action would be borne by the obligated producers.*

*Whilst CTPA would support additional funding for communication or enforcement, consumer behaviour is ultimately not in the direct control of producers, who should focus on the reduction of packaging.*

## Scheme administration and governance

### 78. Overall which governance and administrative option do you prefer? Q74

- Option 1  
 Option 2  
 Neither Option 1 nor Option 2

Please provide the reason for your response.

*As CTPA seeks to reflect the different views of its members, it would note the importance of any governance or administrative proposals including obligated producers.*

*Whilst not necessarily aligning with Option 1, a single PRO with a governance structure constituted from the obligated industry compared with multiple competing compliance schemes would appear to be the most transparent with all funds retained within a UK-wide national system without unnecessary or higher costs from duplication and/or loss of scale, a redundant additional layer of complexity and the need to account for a profit element.*

*However, whilst some of the secondary functions such as communication and litter might fit better within Option 1, there are current compliance schemes with whom producers, particularly smaller companies have well established relationships owing to their expertise in the whole packaging value-chain. Members discuss their experience with compliance schemes as positive and believe that they offer a valuable additional level of oversight and direction.*

*Compliance schemes could add to competitiveness by adapting schemes to suit specific industries. For instance, for the cosmetics industry, recognising that much of our componentry is difficult to recycle within the existing infrastructure, a more bespoke scheme may offer the opportunity to increase collection and ring-fence output to provide high quality, known provenance material.*

## Reprocessors and exporters

89. Do you agree or disagree that all reprocessors and exporters should report on the quality and quantity, of packaging waste received? **Q85**

- Agree
- Disagree
- Neither agree nor disagree

*As there is an increasing requirement for high quality recyclate, all parts of the packaging waste value stream should be monitored for quantity and quality.*

**92. Do you agree or disagree that exporters should be required to provide evidence that exported waste has been received and processed by an overseas reprocessor? Q88**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please detail why you think exporters should not have to provide this evidence.  
*Clear unequivocal evidence must be provided that a material has been physically recycled either here or overseas for obligated producers to have confidence in the system. Any export of packaging waste should be undertaken in a transparent and environmentally responsible manner. The aim, ultimately, should be to ensure resources and infrastructure are in place to nationally handle all the waste we produce to enable the maximum value to be added to the waste material and ensures circularity of resources.*

## Compliance and enforcement

**96. Do you agree or disagree with the proposed approach to regulating the packaging Extended Producer Responsibility system? Q92**

- Agree
- Disagree
- Neither agree nor disagree

If you disagree, please detail any perceived problem or issues with the proposed regulation of the system and provide comments on how the system could be regulated more effectively.  
*Whilst any reduction in de minimis will spread the projected costs of the system, reducing the burden for all, it will bring significantly more businesses into scope. This will require significantly enhanced enforcement, particularly with the addition of on-line marketplaces.*

## Implementation timeline

**101. Do you think a phased approach to the implementation of packaging Extended Producer Responsibility, starting in 2023 is feasible and practical? Q97**

- Yes
- No

Unsure

If you answered 'no', please provide the reason for your response and detail any practical issues with the proposed approach.

*The phased approach will add to burden of reporting and create greater confusion for companies.*

**102. Do you prefer a phased approach to implementing Extended Producer Responsibility starting in 2023 with partial recovery of the costs of managing packaging waste from households or later implementation, which could enable full cost recovery for household packaging waste from the start? Q98**

- Phased approach starting in 2023  
 Later implementation  
 Unsure

Please provide the reason for your response.

*We understand from members that the 2023 timeline would be extremely challenging, whilst 2024 would appear more feasible.*

*It is CTPA's belief that the timeline is extremely challenging for producers. There are significant, onerous, financial implications for companies already struggling to recover from the COVID pandemic. For instance, it will be necessary to create new IT systems for data collection and revisit the design of their packaging to reduce the financial burden of Extended Producer Responsibility and other policies such as the plastics packaging tax in the UK, in addition to the European Green Deal for those companies operating in Europe.*

*However, CTPA also recognises that without reforms, there will not be the opportunity to invest in the necessary infrastructure to increase the quantity and quality of recycled materials.*

*It must also be recognised that the delay in this consultation and subsequent policy design, will impact on the time companies have to ready themselves for its implementation.*

*There is a great opportunity to reform recycling, from product design for recyclability, improvements in the management and reprocessing of packaging to enhance the quality of recycled materials through to empowering consumers to make informed decisions about how to dispose of their waste. the necessary reforms should last for years without further adjustment so it is better to take the time to get the systems right than risk further costly adjustments and additional confusion for consumers.*