

CTPA Response to Defra Consultation on Consistency in Household and Business Recycling Collections in England

About you

1. What is your name?

Christine Lawson

2. What is your email address?

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This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

3. Which best describes you?

Please tick only one option. If multiple categories apply to you please choose the one which best describes you and which you are representing in your response. (Required)

- Local Authority
- Waste management company
- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Reprocessor
- Community group
- Charity or social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other **Trade Association**

4. If you are responding on behalf of an organisation, what is its name?

Cosmetic, Toiletry and Perfumery Association

5. Would you like your response to be confidential?

Yes / **No**

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

The Cosmetic, Toiletry and Perfumery Association Limited

Background to CTPA's Response

[CTPA, the Cosmetic, Toiletry and Perfumery Association](#), is the trade association representing the UK's cosmetics industry. [Membership](#) covers 80 - 85% of the UK cosmetics market by value, and comprises large multi-national companies, SMEs and suppliers to the industry.

Market Value

The UK cosmetics market was worth £9.7 billion at retail sales price in 2018 [1] and the UK cosmetics industry employs 200,000 people. There are at least 320 cosmetic producers in the UK; many of these are small and medium-sized enterprises (SMEs). The UK has the fourth largest concentration of cosmetics SMEs in the EU. Every 10 workers employed by the industry will support two jobs in the value chain, such as professionals using cosmetics, beauticians, hairdressers and stylists [2].

500 million people across the EU use cosmetic products each day, adding to their personal self-esteem and thereby contributing positively to growth and productivity as well as to society as a whole.

Regulatory Framework

In the UK and across the EU the manufacture and supply of cosmetic products is governed by the EU Cosmetic Products Regulation (EU No. 1223/2009) and its amendments [3], hereafter referred to as the Cosmetics Regulation. This Regulation and its amendments are directly applicable in all 28 EU Member States and EEA countries. The Responsible Person is responsible for ensuring compliance with all aspects of the Cosmetics Regulation.

The Cosmetics Regulation is enforced in the UK via the UK Cosmetic Products Enforcement Regulations 2013 [4] which specifies the role of the authorities, the penalties and the enforcement process. The Competent Authority for implementing the Cosmetics Regulation in the UK is the Department for Business, Energy and Industrial Strategy (BEIS) and enforcement in the UK is carried out by Trading Standards.

It is important to note that there is a fundamental safety requirement under the Cosmetics Regulation that stipulates the requirement for each cosmetic product to be the subject of 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 evaluation includes the relevant characteristics of packaging material, in particular purity and stability and any potential interaction between packaging and product during the proposed life of the product.

These requirements of the Cosmetics Regulation have been adopted by the UK within the UK Cosmetics Regulation in the case of a 'no deal' scenario where the UK leaves the EU.

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Consultation questions on dry recycling

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**
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

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

- **Agree**
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

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

As an association, CTPA does not have enough information on this matter to comment.

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

As an industry we recognise that our labelling and communications can help raise public awareness and we are working hard to improve this. Measures need to be considered to support behaviour around recycling and discourage practices that can mask behaviours, such as when communal bins are used.

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.

No additional comments

Proposal 2

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

| | This should be included in the core set | This should be excluded from the core set | Not sure/don't have an opinion/not applicable |
|------------------------------|--|--|---|
| Glass bottles and containers | YES | | |
| Paper and card | YES | | |

| | | | |
|-----------------------------------|------------|--|--|
| Plastic bottles | YES | | |
| Plastic pots tubs and trays | YES | | |
| Steel and aluminium tins and cans | YES | | |

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?

| | This should be included in the core set from the start of Consistency | This should be included in the core set but phased in over time | This should be excluded from the core set | Not sure/don't have an opinion/not applicable |
|----------------------------------|--|--|--|---|
| Food and drinks cartons | YES | | | |
| Plastic bags and film | | YES (linked to delivery of UK WRAP Plastics Pact) | | |
| Other materials (please specify) | Foil, aerosols | | | |

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.

For plastic films it is recommended the UK Plastics Pact/Ceflex project work be explored to enable solutions so that these be implemented nationally as soon as confidence in the system allows.

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?

As above for plastic bags and films.

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

CTPA supports the Government's efforts to introduce a nationally consistent household waste recycling system that improves the quantity and quality of recyclate available to industry. The top issue is moving as swiftly as possible to packaging labelling that has just two messages; recycling bin or waste bin. The message 'check locally' on packaging should not be required. The current On-Pack Recycling Label is widely used and easily understood.

The Government, waste management companies, local authorities and the wider packaging value chain must work closely to overcome any obstacles to implementation of a nationally consistent set of core materials.

Proposal 3

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

- **Yes**
- No
- Not sure/don't have an opinion

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

- Yes – but I would also add some (please specify which conditions you believe should be added ...)
- **No – some/all should be removed (if some please specify below)**
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

CTPA is keen to ensure the different Government initiatives work harmoniously together to adequately fund and encourage advancements in recycling. D states that local authorities would not be adversely affected, including financially. If this were the case, no advancements would be made. Our understanding is any financial burden is offset by the money raised from the revised PRN system.

17. Do you have any other comments to make about Proposal 3? **No additional comments**

Consultation questions on separate food waste collection

Proposal 4

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

| | Agree | Disagree | Not sure/don't have an opinion/not applicable |
|---|-------|----------|---|
| i. at least a weekly collection of food waste | | | As an association, CTPA does not have enough information on this matter as we do not produce food waste. |
| ii. a separate collection of food waste (i.e. not mixed with garden waste) | | | |
| iii. services to be changed only as and when contracts allow | | | |
| iv. providing free caddy liners to householders for food waste collections | | | |

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

- Yes (if yes please provided further details below)
- No
- **Not sure/don't have an opinion**

20. Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

No additional comments

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**
- Specific financial support (please specify)
- Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)
- Communications support, (e.g. free collateral that can be adapted and used locally)
- Technical support, (e.g. free advice from a consultant about round re-profiling)
- Other (please specify ...)

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

No additional comments

Proposal 6

23. What are your views on this proposal?

As an association, CTPA does not have enough information on this matter to comment.

Consultation questions on collecting garden waste

Proposal 7

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

| | Agree | Disagree | Not sure/don't have an opinion/not applicable |
|---|-------|----------|---|
| i. a free garden waste collection for all households with gardens | | | As an association, CTPA does not have enough information on this matter as our industry does not produce garden waste. |
| ii. A capacity to 240l (bin or other container eg sack) | | | |
| iii. A fortnightly collection frequency (available at least through the growing season) | | | |
| iv. ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement | | | |

| | | | |
|---|--|--|--|
| v. this new requirement to start from 2023 (subject to funding and waste contracts) | | | |
|---|--|--|--|

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

No additional comments

Consultation questions on separate collection to improve quality

Proposal 8

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

- **Yes**
- No (why ...?)
- Not sure/no opinion/not applicable

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

Other than difficulties already cited such as communal collections, CTPA does not have enough additional information on the matter. We would be keen to have more information from local authorities and recycling firms on the barriers to recycling to help our members improve their packaging design for recyclability.

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

No additional comments

Consultation questions on bin colour standardisation

Proposal 9

29. Do you agree or disagree with this proposal?

- **Agree – bin colours should be standardised for all waste streams**
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

CTPA agrees that bin colours should be standardised to improve communication and behaviour, although would be concerned if this was given priority over investment in infrastructure and resulted in more plastic waste from redundant bins. Labelling or colours on products and bins needs to be consistent to enforce the message about recycling and ensure the maximum capture of the correct materials.

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 1 – as and when waste contracts are renewed.**
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways please specify...

31. Do you have any other comments to make about Proposal 9?

No additional comments

Consultation questions on service standards

Proposal 10

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

- **Agree**
- Disagree – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

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?

- Agree
- Disagree, a better system would be for the single not-for-profit body established under the EPR system to have responsibility for reviewing guidance on an ongoing basis.
- Disagree – it should be **less often**
- **Not sure/no opinion/not applicable**

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?

- **Agree, a minimum weekly collection will build confidence and improve recycling behaviour**
- Disagree – it should be more often
- Disagree – it should be less often
- Not sure/no opinion/not applicable

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

No additional comments

Consultation questions on communicating about recycling

Proposal 11

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

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

CTPA supports this

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

- **Awareness of core set of materials for recycling**
- **Labelling on packaging, recycling or waste**
- **No 'Check locally' option**
- **Clear information on recycling items on-the-go**

Proposal 12

38. Do you agree or disagree with this proposal?

- **Strongly Agree – government should work with local authorities and other stakeholders on this**
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

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

Transparency of information about the end destination for household recycling will help dispel myths and build confidence that changing behaviour can make a difference. It will also expose bad practice. Clear unequivocal evidence must be provided that a material has been physically recycled either here or overseas. By preference, recycling should take place domestically rather than overseas to retain the resource and increase its value, providing more quality recyclate for British companies to use in their packaging.

Consultation questions on end markets

Proposal 13

40. Please use this space to briefly explain any comments you have on the issues discussed in this section.

The aim, ultimately, should be to ensure resources and infrastructure are in place to handle all the waste we produce. Not only is this a moral imperative, it also enables maximum value to be added to the waste material and ensures circularity of resources providing more quality recyclate for British companies to use in their packaging.

Consultation questions on non-binding performance indicators

Proposal 14

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to delivery higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

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

- Agree
- Disagree (why ...?)
- **Not sure/no opinion/not applicable**

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

- Agree
- Disagree (please expand ...)
- **Not sure/no opinion/not applicable**

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

As this section focusses on local government, who may have their own political priorities, it is difficult to understand how action would be achieved if the performance indicators are not binding. Without absolute consistent, uniform action, the messaging about recycling will remain muddled.

Consultation questions on alternatives to weight-based metrics

Proposal 15

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

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

- Agree
- Disagree (why ...?)
- **Not sure/no opinion/not applicable**

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

- Agree
- Disagree (why ...?)
- **Not sure/no opinion/not applicable**

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

As an association, CTPA does not have enough information on this matter to comment.

Consultation questions on joint working

Proposal 16

We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

47. Could greater partnership working between authorities lead to improved **waste management and higher levels of recycling?**

- **Strongly Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

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

Local governments may have their own political priorities and differences. Budgets are under pressure with the focus being on core, statutory services. Moneys raised from systems such as PRN must be ploughed directly back into improving recycling to increase public trust in the system and maximise the benefit to the environment.

49. How might government help overcome these barriers?

Enforce the message that consistency is key to changing consumer understanding and behaviour with the aim of reclaiming the maximum amount of resources for recycling into high quality, valuable recycle.

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

No additional comments

Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

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, this is still valuable waste**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

52. Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling
- **Something else - There are already examples where mixed dry recycling includes glass (Such as Westminster municipal collections), i.e. completely mixed dry recycling plus separate food recycling**
- Not sure/no opinion/not applicable

53. We would expect businesses to be able to segregate waste for recycling in all circumstances but would be 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**

- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

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

- Yes (which ones and why...?)
- **No, although those handling hazardous waste would need to ensure it is collected appropriately, as they must now**
- Not sure/no opinion/not applicable

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?

No additional comments

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
- Disagree (why ...?)
- **Not sure/no opinion/not applicable**

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?

- Agree
- Disagree (why ...?)
- **Not sure/no opinion/not applicable**

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?

As an association, CTPA does not have enough information on this matter to comment.

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

As an association, CTPA does not have enough information on this matter to comment.

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

- Yes (which ones and why ...?)
- No
- **Not sure/no opinion/not applicable**

61. Do you have any other comments to make about proposal 18?

No additional comments

Proposal 19

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

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

CTPA would support these using funds generated by the EPR system.

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

As an association, CTPA does not have enough information on this matter to 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?

No additional comments

Business waste data

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 – it is to be encouraged where feasible, though it may be that a waste management company acting on behalf of a business reports this data.**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

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

No additional comments

References:

- [1] **The Cosmetic, Toiletry and Perfumery Association** “[Cosmetics Industry in Figures](#)”
Kantar Worldpanel April 2019 (under preparation)
- [2] **The Cosmetic, Toiletry and Perfumery Association** “[Getting the Best from Exiting the EU](#)”
- [3] L342/59 “[Regulation \(EC\) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products \(recast\)](#)”
- [4] Statutory Instruments 2013 No. 1478 “[The Cosmetic Products Enforcement Regulations 2013](#)”