

# Implementing EPR in the UK – the recycling industry perspective

Introduction of the EPR system in Armenia

15<sup>th</sup> November 2022

*Jacob Hayler*

*Executive Director*

*Environmental Services Association*



environmental  
services  
association

# ESA...

- is the trade association for the resource & waste management industry
- members represent the majority of the sector
- is funded by member subscriptions
- works to raise standards



environmental  
services  
association

# Outline

- 1. Main elements of UK system:** modulated fees; standardised payments to LAs; PRNs; I&C
- 2. How did we get here?** Policy co-design
- 3. Benefits and opportunities:** environmental; efficiency
- 4. Implementation challenges:** disruptive transition



# Main elements of UK system

- **Modulated fees** – lower fees for more easily recyclable formats to encourage eco-design
- **Standardised payments to Local Authorities** – performance-related pay to municipalities, adjusted by deprivation and density
- **Producer Recovery Notes** – revenue support for material reprocessors
- **Commercial waste** – too difficult to include from outset but commitment to examine case by 2027



environmental  
services  
association

# How did we get here?

- **RWS published in 2018**
- **Initial consultations 2020**
- **In depth consultations 2021 –**  
multiple sprint groups examining  
individual areas in detail
- **Timeline – 2023 reporting, 2024**  
basic payments + transfers, 2025 full  
system



environmental  
services  
association

# Benefits & opportunities

- Incentives in the right place - lowering whole-system costs
- Reduced pressure on public budgets
- Private sector control over system design & outcomes
- Demonstrates environmental leadership
- Potential for priority materials access
- Better recyclability design + higher recycling rates



environmental  
services  
association



# Implementation challenges

- Space for sampling
- Modifying contracts
- Reconfiguring/upgrading existing facilities
- Investing in new sites
- Downtime for plant upgrades
- Procuring vehicles, plant & equipment



# Conclusions

- There is a lot of forthcoming environmental legislation in the pipeline
- Early engagement with design of EPR system would bring clear benefits to producers
- Incentives need to be put in the right place with right behaviours rewarded
- Future liabilities and risks from other interventions could be reduced





15<sup>th</sup> November 2022

*Jacob Hayler*  
*Environmental Services Association*

**THANK YOU**



environmental  
services  
association