

Response submitted online

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Dear Sir/Madam,

Please find below our response on the following consultation.

- Extended Producer Responsibility for Packaging

EAUC – The Alliance for Sustainability Leadership in Education:

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £43 billion, responsible for educating over 4.5 million students supported by over half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

Response to the consultation:

We responded to the first consultation in May 2019 and welcome the opportunity to respond to the second consultation.

Extended Producer Responsibility for Packaging

We agree the outdated packaging waste regulations need reform and we welcome a UK-wide approach while appreciating that under the Northern Ireland Protocol, Northern Ireland must comply with the Packaging Waste Directive.

We support the Polluter Pays Principle as it is right that the producers of packaging should be liable for the full net cost. There should be no exception for producers, irrelevant of size.

Mandatory labelling requirements, while welcome, must be consistent and clear enabling the consumer to dispose of the packaging into the correct waste stream and therefore avoiding contamination and ultimately landfill. Therefore, our preferred option for implementing mandatory labelling is Option 2: a single labelling scheme.

Local authorities' collections must be consistent. For example, students in student housing have to navigate at least two different collection systems (term time and non-term time residences) which can be very confusing. Consistency would improve rates of correctly recycled packaging. There should also be standardisation for private waste contractors.

Compostable and biodegradable at industrial scale is very limited in the UK due to lack of AD facilities. This can lead to consumer confusion over whether they are to be recycled or not. This needs to be clear on the labelling.

Disposable single use cups (coffee cups) are a prevalent issue and while the voluntary National Cup Recycling Scheme has had some success the consultation itself acknowledges the limitations of a voluntary scheme. Therefore, we are in favour of the proposed producer disposable cups takeback obligation. Although a long-term solution is to move away from disposable products to reusable.

We believe bringing in the EPR and incentivising recycling through a DRS is a good combination of initiatives that should have the desired effect on reducing the amount of single use items in the environment. We would encourage the Government to not delay implementing the schemes, to work with the devolved governments and to focus on communicating clear and consistent messaging.

We hope you find this information useful and we would be keen to discuss the role of Further and Higher Education with tackling waste and recycling moving forward.

Yours sincerely



Iain Patton
CEO