

The Circular

from ERP

Q2 2021



European
Recycling
Platform

A Landbell Group Company

Plastic Tax

Are you ready? ERP can help.

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This year's collection requirements for the UK

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Meet the team

We would like to introduce our Order Fulfilment Officer, Rejina.

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click through to
take you to the
articles.*



John Redmayne
Managing Director at ERP UK Ltd

Consultation season

We expected 2021 to be a year of consultations – and so far it is living up to expectations!

ERP have already contributed to meetings and workshops in preparation for future changes to the UK's Extended Producer Responsibility Regulations on WEEE (consultation expected July) and Batteries (consultation expected 'late 2021').

As I write this we are just finalising ERP's response to the long-awaited suite of consultations on EPR for Packaging, Deposit Return Scheme and Collections Consistency. These herald very significant scale changes for producers to almost all the aspects of the packaging waste regulations which have been in place for over 25 years! The producers obligated will change, more detailed data reporting will be required and costs will certainly increase as a result of the costs of collecting packaging from households and business being included on the basis of recovering 'full net costs'.

We have supported members with information and webinars – but there remains a shortage of detail for those who want to plan ahead, know what they need to do – and what it will cost them! The timetable for implementation of such a complex and far-reaching set of changes (2023/24) also looks ambitious.

The Plastics Packaging Tax is not a consultation any more – and will be a reality for many producers in April next year. We have delivered webinars on this for our members and data service customers as well as producer trade associations and suppliers to our data service customers. These have proved very popular – with the first one proving there really was a limit to the number of attendees allowed on our webinar account! Like many others we are awaiting more detailed guidance on the systems and approaches from HMRC and will update you accordingly later in the year. In the meantime, our Data Services Team are ensuring our systems and processes are ready to support customers with these new requirements.

ERP UK continues to follow government guidance on Covid-19 and so the majority of UK staff continue to work from home. Our team has not stood still – with new colleagues joining the compliance and data services teams. We are looking forward to the full easing of UK restrictions and to being able to get our fantastic team together again – including getting to know the considerable number of new faces who have joined the business during the last year.

John Redmayne





Member News



WEEE & battery data rounds

Data reporting for Q2 2021 batteries and Q2 2021 B2C will begin shortly. We would like to ask that members submit their data no later than **15th July 2021**. We also kindly ask producers to:

- Ensure that all EEE and batteries made available to the UK market is reported in the relevant reporting periods (see table below);
- Have submissions approved by a legal signatory of the company or delegated authority who has prior written consent for 2021, and
- Account for any fluctuations in data by including a brief explanation within the data submission. Please note that comparisons are made against the data from the same period of the previous year.

Please contact your account manager should you require any assistance with your data reporting.



2021 Packaging registrations

We are very pleased to confirm that we have completed the 2021 registrations for our packaging members. Thank you to all members for assisting us with this and providing the required details during this time.

Members should have now received copies of their 2021 registration certificates as confirmation of this.

Otherwise, if you have any questions regarding your 2021 registration, please do get in touch with your account manager.



Reporting Periods	Reporting Deadlines
Q1: 1st January to 31st March	Wednesday 15th April 2021
Q2: 1st April to 30th June	Wednesday 15th July 2021
Q3: 1st July to 30th September	Thursday 15th October 2021
Q4: 1st October to 31st December	Friday 14th January 2022
2021 B2B EEE: 1st Jan to 31st December	Friday 14th January 2022



2021 ERP audit programme now underway

ERP has now begun contacting members to book in audits for WEEE, Batteries, and Packaging in 2021.

Our audit programme is in place to support members by ensuring data is being submitted accurately, and all appropriate obligations are being met. It also provides a great opportunity to provide bespoke advice and guidance on best practices.

In the current climate, we plan to carry out audits via online calls, however depending on future government restrictions this may expand to include opportunity for site visits.

We will be contacting a range of customers depending on the date of the previous ERP audit, whether you are a new customer to ERP, or other reasons that might make an audit beneficial to your business.

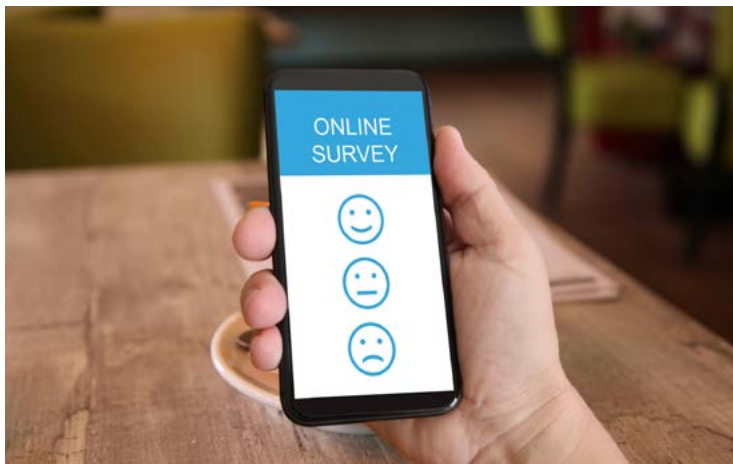
Packaging – PRN market update

We have recently sent the Q2 PRN market update.

We expect PRN prices to remain subject to considerable variation as we move out of lockdowns. However, as levels of normal economic activity return, we expect more predictable price patterns to emerge.

DEFRA are currently consulting on significant changes to producer responsibility in packaging, in which the PRN system is to be phased out within the next 4-5 years.

Please contact us at ukcompliance@erp-recycling.org if you require a copy of our latest Market update



EEE scoping guidance updated in January 2021

In January 2021, the government updated their EEE scoping guidance webpage, which can be found [here](#).

The guidance page is designed to help producers decide whether products are classified as EEE or might be exempt from the regulations, as well as providing advice on which categories to use for EEE reporting. The page is particularly useful in providing lists of examples for each category, which ERP would recommend if seeking some scoping guidance on potential EEE products.

Of course, if you need any support with scoping your products, please contact your account manager or email ukcompliance@erp-recycling.org.

Role of online retailers for WEEE collections

The government are considering increasing WEEE collection responsibilities for online retailers and marketplaces, to match the obligations held by physical retailers.

Following an Environment Audit Committee’s report, published in November 2020, the government’s response on the obligations of online retailers seems to be issued with the following considerations:

- Aiming to tackle growing amounts of e-waste being disposed of incorrectly.
- Increasing ease for consumers when recycling WEEE.
- Ensuring the responsibilities of both physical retailers and online retailers are equal.
- Exploring possibilities to enhance retailer obligations through increasing WEEE collection points.

Further information can be found in the government response [here](#), on pages 6 – 8.

ERP take back solutions

ERP is proud to offer take back solutions to our membership, working alongside audited waste processors throughout the country. More businesses are being encouraged to provide take back to end users, for example, following the changes to the DTS this year (see below for details).

If you are interested in our take back solutions, please contact your account manager at ukcompliance@erp-recycling.org or visit our [website](#) for more information. We would then look to find out more about your requirements and provide some options to suit your needs.



Since 1st January 2021, the following retailers no longer have the option to join the Distributor Take Back Scheme (DTS) and will need to provide in-store take back of WEEE:

- Retailers with at least one physical store in the UK selling over £100,000 of electrical products; and
- Retailers with one physical store in the UK selling over £100,000 of electrical products who have a mix of online and physical sales

Retailers providing in-store take back of WEEE also have an obligation to provide written information to customers. [Recycle Your Electricals](#) produced an [OPSS/BEIS approved communications toolkit](#) which retailers might find helpful and we would recommend.





Packaging data collection

Data collection is now underway for this year and we have already seen a good supplier response to our requests for data. As a part of this on-going activity we carry out some targeted data collection through the contacting of suppliers and manufacturers. Your support with this activity is greatly appreciated and we will be in touch if we feel that a focused data collection exercise would be best suited for your business.

As you might be aware we now collect data at a much more detailed level which includes packaging components, plastic polymer types, recycled content percentages and recyclability labelling. The reason we collect this detailed information is to future proof the service for the potential changes in legislation over the next couple of years.

Plastic packaging tax update

ERP have been busy developing a service around the reporting requirements of the new Plastic Packaging Tax. Building on our data collection and reporting experience for the Packaging Waste Regulations, ERP will be offering a new service for businesses affected by the new tax.

The tax will take effect from April 2022 and applies to plastic packaging produced in, or imported into the UK that does not contain at least 30% recycled plastic.

Account managers will be getting in touch with customers we believe will be impacted by the tax to discuss the service and reporting requirements in more detail.

If you have any questions about the plastic packaging tax, and how it will affect your company, please contact your account manager directly or the Data Services team at ukdataservices@erp-recycling.org

For general information on the tax can be found [here](#).



2021 ERP membership compliance badges – now available!

ERP Membership badges are now available for our members! The badges can be used on the environmental pages of websites, in brochures, or even sales documents as proof of compliance scheme membership and that extended producer responsibility obligations are being fulfilled.

There are different designs and file sizes for members to choose from, so please contact your account manager at ukcompliance@erp-recycling.org if you are interested!

Green Dot licensing

The Green Dot is a widely recognised symbol for packaging across Europe, used by an estimated 170,000 businesses. In many countries, it is mandatory for these companies to pay a license fee to use the Green Dot in that country, and to ensure that the Green Dot is printed on packaging prior to placing goods on the market.

Although it is not mandatory to display the Green Dot on packaging supplied to the UK, many businesses choose to purchase the license to avoid investing in different packaging designs (with and without the Green Dot) for each market.

ERP are now in the process of supporting members who require Green Dot licensing. If you are a business that also needs to use the Green Dot symbol and therefore require a licence, please do contact us at ukcompliance@erp-recycling.org for extra information.



2021 WEEE collection targets

DEFRA has set the following overall WEEE collection targets which show a small overall increase over 2019 targets. Collection performance during 2020 was not included in DEFRA's overall analysis when setting the 2021 targets:

Category	Target 2019 (tonnes)	Collected 2019 (tonnes)	Target 2020 (tonnes)	Collected 2020 (tonnes)	Target 2021 (tonnes)
Large Household Appliances	188,282	175,236	185,354	186,368	187,398
Small Household Appliances	56,693	35,542	34,152	27,938	34,512
IT and Telecoms Equipment	49,334	44,798	39,121	31,974	41,391
Consumer Equipment	38,055	30,034	24,106	19,557	24,386
Lighting Equipment	0	582	5,559	4,483	5,747
Electrical and Electronic Equipment	25,513	17,838	24,733	20,147	24,892
Toys Leisure and Sport	3,095	2,283	4,950	3,968	5,013
Medical Devices	26	3	4	13	5
Monitoring and Control instruments	202	156	1,074	969	1,110
Automatic Dispensers	1	0	0	0	0
Display Equipment	48,708	44,615	39,495	36,029	37,726
Cooling Appliances Containing Refrigerants	135,415	134,811	134,200	125,005	137,030
Gas Discharge Lamps and LED Light sources	5,168	4,553	4,553	3,445	4,145
Photovoltaics Panels	87	65	87	236	274
Total	550,579	496,514	497,388	460,134	503,629

What does this mean for ERP members?

If you are a B2C producer, the 2021 collection targets are used to determine your WEEE recycling obligation, and are reflected in your compliance fee invoicing from Q2 this year (with necessary adjustments made for Q1 invoicing).

Extended producer responsibility consultation for packaging

This consultation proposes significant changes to producer responsibility in packaging. The scope is to be extended to producers covering the full net cost of dealing with packaging waste across the community.

ERP will be responding. We seek to ensure that the new measures are fair and proportionate to all parties involved in the packaging value chain, as well as ensuring that the new regulations build on the success of the PRN system.

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ERP will be responding. We seek to ensure that the new measures are fair and proportionate to all parties involved in the packaging value chain, as well as ensuring that the new regulations build on the success of the PRN system. The consultation documentation can be found [here](#).

The shortened period for responses to DEFRA's consultation closes on June 4th.

Deposit Return Scheme (DRS) consultation

In addition to the Packaging Extended Producer Responsibility (EPR) consultation, DEFRA are also consulting on the implementation of a Deposit Return Scheme for single-use beverage containers in England, Wales and Northern Ireland. The cost of operating the system will be borne by the brand owners.

The Scottish Government have already decided to introduce their own "all-in" (all types) system from July 2022, when a 20p returnable deposit will be levied on drinks containers as they are sold. The customer can redeem this when the used container is returned for recycling. One option is to extend this model across the UK.

DRS systems will overlap with the aims and operation of packaging EPR so careful consideration will be required in both schemes to achieve the best

environmental and economic outcomes.

The consultation documentation can be found at [here](#).

Again, the consultation period ends on June 4th.





Industry News

Restriction of Hazardous Substances (RoHS) exemptions update

The government has published new guidance on RoHS exemptions, with information on exemption criteria, and applying for and managing exemptions.

Producers of EEE have a responsibility to ensure that certain substances and chemicals deemed hazardous do not exceed dangerous levels. The list of restricted substances can be found [here](#).

Certain exemptions exist regarding the use of restricted substances where the following apply:

- REACH (registration, evaluation, authorisation, and restriction of chemicals) regulations deem that the use of restricted substances/chemicals will not weaken environment and health protection.
- Substitutes for a restricted substance are not scientifically or technically practicable or reliable.
- The negative social, health and consumer impacts of the substitute are greater than the benefits.

Producers seeking exemptions will need to prepare research and documentation to apply. More information on this, and other exemption criteria and considerations can be found [here](#).

If you need any support, H2 Compliance, part of the Landbell Group, provides consultancy services to assist companies to comply with product safety regulations such as REACH and RoHS. To find out more, you can visit the website [here](#).



DS Entsorgung sets up new battery scheme

Landbell Group company DS Entsorgungs- und Dienstleistungs- GmbH has set up a new takeback scheme for waste portable batteries in Germany, which is operating from its headquarters in Mainz.

The scheme was approved on 1st October by the responsible authorities in the federal state of Rhineland-Palatinate and is now in operation throughout Germany.

[More here](#)

Environment Bill returns to parliament

Work on implementing policies which will be enabled via the Environment Bill continued despite the halting of its passage through parliament. The bill outlines how the government plans to reduce waste and make better use of the resources as well as policies aimed at transforming the environment.

More information can be found [here](#)



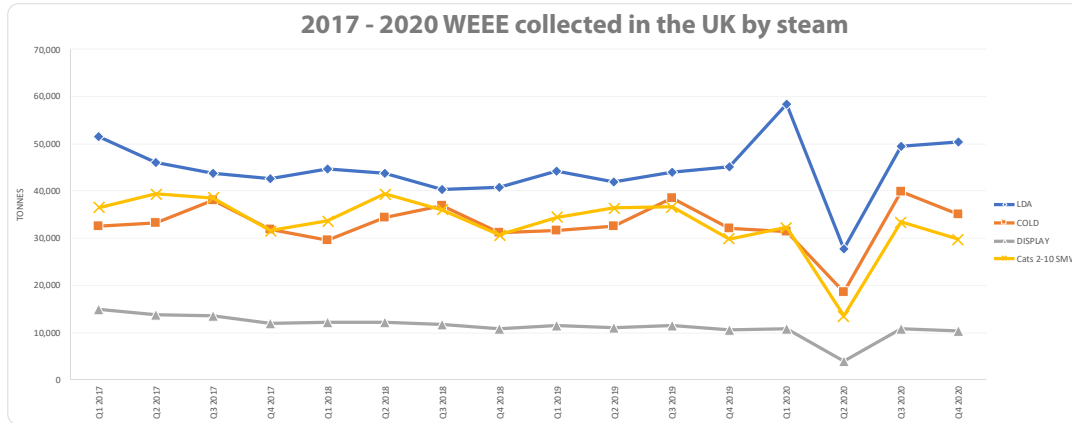
Compliance Data



WEEE - government data analysis for the UK

Last quarter, the Environment Agency published the Q4 2020 WEEE recycling data.

Comparing the total amount of WEEE collected in 2020 with 2019, there was an overall 7% decrease. This is not unexpected due to the pandemic restrictions, which meant a significant drop in Q2 2020 especially.



Q1, 2021, WEEE collected against 2021 target

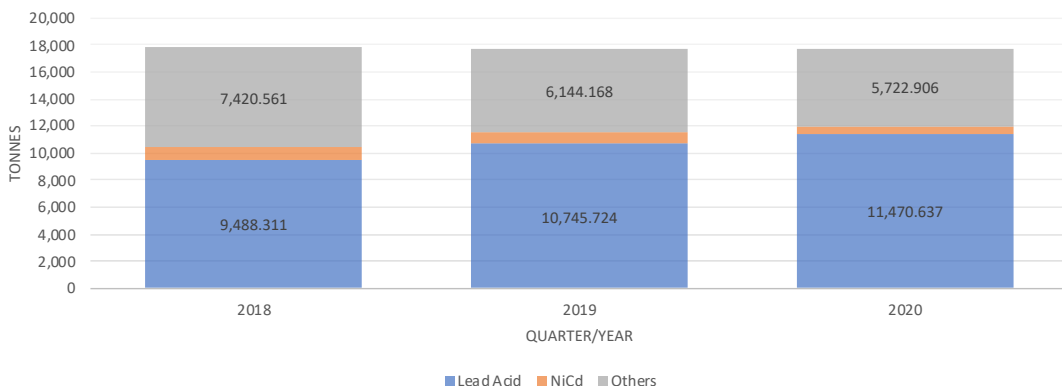
Stream	Q1 2021 UK WEEE collected	2021 DEFRA targets	Progress to targets %
LDA	47,535	187,398	25%
COOLING	32,871	137,030	24%
DISPLAY	9,849	37,726	26%
Cats 2-10 SMW	28,640	137,056	21%
LAMPS	861	4,145	21%
PVP	63	274	23%
TOTAL	119,818	503,629	24%

Compliance Data



Battery - government data analysis for the UK

UK Waste portable batteries collected - Year on Year



The Environment Agency published the Q4 2020 battery data showing a 12% increase in the amount of waste portable batteries collected compared to Q4 2019. Overall, comparing the total batteries collected in 2019 and 2020, there was only a 53 tonne increase (0.3%).

The final 2020 data will be published in June however, based on the current data available, the UK has not met the 45% target. The achievement is currently 44.90%.

Overall there was a significant increase on waste portable batteries collected in Q1 2021 vs Q1 2020, mostly due to a significant increase in lead acid collections

	Q1 2020	Q1 2021	% Variance
Lead Acid	2,784.836	3,752.129	34.73%
NiCd	129.511	91.143	-29.63%
Others	1,273.849	1,081.197	-15.12%
TOTAL	4,188.196	4,924.469	17.58%

Interestingly there has also been an increase of portable lead acid batteries placed on the market in Q1, 2021 compared to this time last year.

Compliance Data



Packaging - government data analysis for the UK – 2020

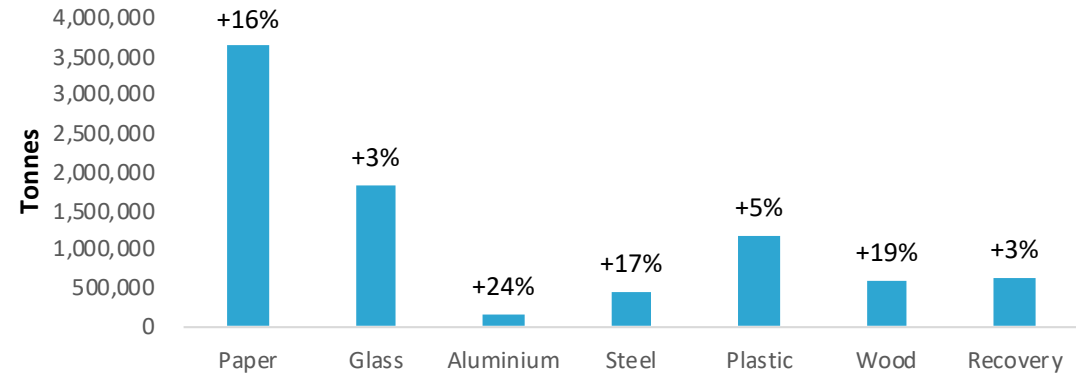
The Environment Agency released data for the 2020 compliance year at the end of March.

Despite the challenges of the lockdown, the PRN system again delivered full compliance with government’s targets.

The 818,000 tonnes excess in recycling was more than sufficient to cover the general recycling obligation of 597,000 tonnes.

Material	UK Requirement (tonnes)	Received for Recycling	Received over Requirement
Paper	3,116,052	3,628,218	+16%
Glass	1,782,125	1,841,265	+3%
Aluminium	122,400	151,718	+24%
Steel	379,250	442,358	+17%
Plastic	1,117,579	1,174,476	+5%
Wood	502,888	599,980	+19%
Recovery	619,019	638,843	+3%
	7,639,313	8,476,858	

Packaging received for recycling in 2020 compared to the UK requirement





Meet the team



We would like to introduce our Order Fulfilment Officer (OFO) Rejina in this newsletter.

Rejina

Q How long have you been with ERP UK?

A Rejina: I joined ERP UK in September 2019 so it has been over a year, working in the Operations department as Order Fulfilment Officer (OFO).

Q Tell me about your experience before joining the ERP team.

A Rejina: After completing my university studies in 2016, I travelled to Australia & New Zealand on a working holiday visa where I gained various skills in sales, hospitality, customer services and operations. Returning back to the UK in 2018, I gained further experience in Operations in particular working in different companies.

Q What does a typical day look like for you?

A Rejina: There are 3 of us in the order fulfilment team and a typical day would start with a team meeting in the morning. We discuss the needs for the day and set up tasks for all of us. I then focus on the highlighted tasks for me for the day and deadlines that need to be met. Every day is productive and different!

Q What motivates you in your role?

A Rejina: I am a self-motivated individual who likes to find positivity in every situation. Working for ERP as OFO is like a steppingstone to my professional career. The role itself can be very challenging at certain points but the creativity needed to deal with a problem is what makes my job very enjoyable.

Q In your opinion how does ERP stand out in comparison to other Producer Compliance Schemes?

A Rejina: We have a fantastic and dedicated team in ERP. We value our customers and will go the extra mile to build and maintain relationships for a longer term.





Events diary



Member workshops

ERP UK will continue to hold compliance member workshop throughout the year.

Due to the uncertainty of the current COVID-19 situation, we have chosen to run customer workshops taking place in Q2 as online webinars. Pending government advice, workshops scheduled during Q3 and Q4 will proceed as face to face meetings at the locations below.

Places are limited so we encourage you to book as soon as possible.

To book your place for the Q2/Q3/Q4 WEEE & Batteries or the Half Year 2 Packaging workshops, please send an email to ukcompliance@erp-recycling.org or click on a link below to register.



WEEE & Batteries Workshops

17th June 2021

[Q2 2021 WEEE & Batteries Workshop, Register here](#)

6th Oct 2021

[Q3 2021 WEEE & Batteries Workshop, Register here](#)

7th Jan 2022

[Q4 2021 WEEE & Batteries Workshop, Register here](#)

Packaging Workshops

15th Sept 2021

[Half Year 2 Packaging Workshop, Register here](#)

ERP's EPR glossary



ATF Approved Authorised Treatment Facility (for WEEE)

ABE Approved Battery Exporter

ABTO Approved Battery Treatment Operator

AE Accredited Exporter (for Packaging)

AR Accredited Reprocessor (for Packaging)

ATF Authorised Treatment Facility (for WEEE)

BFR Brominated Flame Retardants

CA site Civic Amenity (see also HWRC)

CIO Consumer Information Obligation (for Packaging)

CIWM Chartered Institution of Wastes Management

CSR Corporate Social Responsibility

DCF Designated Collection Facility (for WEEE)

DEFRA Department for Environment, Food and Rural Affairs

DOENI Department for the Environment Northern Ireland

DTS Distributor Takeback Scheme (for WEEE)

EA Environment Agency (see also SEPA, NRW and NIEA)

EEA European Environment Agency

EFW Energy from Waste

ELV End of Life Vehicles

EMS Environmental Management System

EPR Extended Producer Responsibility

ESA Environmental Services Association

HDPE High Density Polyethylene

HWRC Household Waste Recycling Centre

LA Local Authority

LARAC Local Authority Recycling Advisory Committee

MRF Materials Recovery Facility

MSW Municipal Solid Waste

NIEA Northern Ireland Environment Agency

NPWD National Packaging Waste Database (Batteries & Packaging)

ODS Ozone Depleting Substance

PCB Polychlorinated Biphenyl

PCB Printed Circuit Board

PERN Packaging Waste Export Recovery Note

PP Polypropylene

PRN Packaging Waste Recovery Note

PS Polystyrene

PVC Polyvinyl chloride

RCV Refuse Collection Vehicle

ROHS Restriction Of Hazardous Substances (in EEE)

SEPA Scottish Environment Protection Agency

WAC Waste Acceptance Criteria

WBA Waste Batteries and Accumulators

WCA Waste Collection Authority

WDA Waste Disposal Authority

WEEE Waste Electrical and Electronic Equipment

WFD Waste Framework Directive

WRAP Waste and Resources Action Programme

WBA Regulations means The Waste Batteries and Accumulators Regulations 2009 (SI 2009/890);

WEEE Regulations means the Waste Electrical and Electronic Equipment Regulations 2013 (SI 2013/3113); and

WEEE Settlement Centre means the government-funded online facility used to record evidence of WEEE treatment and to allow issuance and holdings of Evidence Notes to be monitored.

In addition, the words **Battery**, **Consumer Information Regulations**, **Placing on the Market**, **Evidence Note** and **Batteries Evidence Note** shall have the meanings attributed to them in the relevant Regulations (including any meanings ascribed through judicial interpretation).

Get in touch

Please get in touch – we'd love to hear from you!

For general enquiries:

Call: + 44 203 142 6452

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