

Q4 Newsletter | December 2022

Features

Contents



03 | Message from our Managing Director

In my last message I speculated about whether plans and timetables for changes to producer compliance would be further delayed... The answer turns out to be No, Yes and Yes!

Packaging EPR

The new system, transferring a much greater basket of costs to producers, seems to be on track for implementation in 2024 and 2025. There remains much practical detail still to see and understand from government, but legislation is currently in parliament setting out the new reporting requirements for producers. As reporting will be 6 monthly and 2024 obligations will be based on 2023 volumes the reporting cycle starts in Q3 2023 (for Q1&2 2023 data).

Additional details are covered in this newsletter and our ERP teams are committed to providing you with comprehensive support on the changes as further details and deadlines are revealed throughout the year, including a monthly webinar.

WEEE

The consultation on amendments to the current system is now anticipated

in the first half of 2023. This may still allow time for implementation in 2025 – but we will keep you informed.

Batteries

The consultation on significant changes to the current compliance system is expected in the second half of 2023. Following this, implementation could happen in 2025 - but this is starting to look tight. In parallel, our Landbell EPR policy colleagues are monitoring the progress of the revision of the EU Battery Directive, which seems likely to be clarified early in 2023 – enabling the UK to be aware of changes. Whilst the UK can, of course, set its own direction of travel the message to government from the producers and trade associations ERP work with is that it makes practical sense for the placing on the market requirements to be as similar as possible.

Season's greetings

So 2023 looks to be another year busy with changes and consultations in UK producer responsibility – but that's for another year. For now, thanks to you for working with ERP in 2022 and we look forward to doing so again in 2023.

Instead of sending out Christmas cards to our customers and partners, ERP has made donations to the following:

Phelan-McDermid Syndrome Foundation who support and engage all affected by this rare genetic condition. Please visit the website to find out [more >](#)

WasteAid who work with communities and policy makers in lower and middle-income countries to implement waste management and recycling programmes. Please visit the website to find out [more >](#)

On a final note

Wishing you a safe and enjoyable festive season.

John Redmayne
Managing Director, ERP UK





04 | Member news



Data Rounds - WEEE & Battery

On return in the New Year, the below weight data will be due by 13th January 2023:

- Q4 2022 B2C EEE
- Q4 2022 battery
- 2022 B2B EEE

We would like to kindly ask Members 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 2022, and
- Account for any fluctuations in data by including a brief explanation within the data submission (if prompted when inputting the data). Please note that comparisons are made against the data from the same period of the previous year.

2023 WEEE and Battery Certificates of Registrations

We have been busy preparing the 2023 WEEE and Battery scheme member registrations.

Once the Environment Agency have confirmed their acceptance, we will provide all registered members with a certificate of registration for your records.

Packaging PRN Market Update for Q4 2022

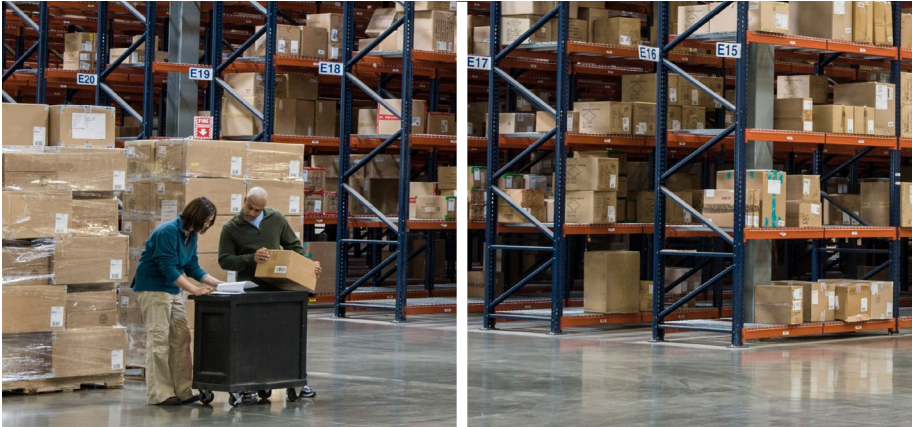
To help our packaging members understand the current conditions of the PRN market, we recently provided our Q4 2022 PRN market update. If any packaging members have not received our recent market update, or would like to discuss PRNs in more detail, please contact your Compliance Account Manager, or email ukcompliance@erp-recycling.org

Reporting Periods	Reporting Deadlines
Q1: 1st January to 31st March	Thursday 15th April 2021
Q2: 1st April to 30th June	Thursday 15th July 2021
Q3: 1st July to 30th September	Friday 14th October 2022
Q4: 1st October to 31st October	Friday 13th January 2023
2022 B2B EEE: 1st Jan to 31st December	Friday 13th January 2023





05 | Member news



Environmental compliance – The latest developments

What are the latest developments concerning environmental legislation globally? We've picked out some highlights for you for December 2022.

Proposal for new EU Packaging Regulation published

On 30 November, the European Commission published its proposal for the planned revision of the legal framework for packaging and packaging waste. As expected, the character of the corresponding legal act is to be changed from a directive to a regulation, meaning it would be directly applicable in the member states

The three main objectives of the new regulation are:

1. Waste prevention: The amount of packaging waste is to be reduced by

40% per member state and capita by 2040 (compared to 2018), among other things by avoiding unnecessary packaging (through bans, for example, on single-use packaging for fruit and vegetables) and increased reuse and refilling of packaging (through corresponding quotas for companies);

2. Improved recycling: By 2030, all packaging should be recyclable in an economically viable manner (for example, by setting design criteria for companies); and

3. Increased use of secondary raw materials: The demand for primary raw materials is to be significantly reduced and the market for secondary raw materials strengthened (for example, by imposing requirements for the use of recycled materials).

In a next step, the Commission's proposal will be discussed in the European Parliament and the Council of the European Union.



NEED HELP WITH EPR

ERP can help your business today

If you need clarity of the EPR impacts that will affect your business or would simply like to know if you are directly affected by the UK's EPR Reforms, then ERP UK is here to help you.

Our solutions cover all aspects of battery recycling and can simplify processes for all businesses, small, medium, and large.

[Find out more here](#)





06 | Industry news



Consultation on Reforming the PRN System

DEFRA has published its response to Spring 2022's consultation covering the introduction of enhancements to the Packaging Waste Recovery Note (PRN) system that packaging producer responsibility is based upon in the UK.

The consultation sought stakeholder views on an array of potential reforms, including new reporting requirements on those accredited to produce PRNs or their export equivalent PERNs, measures that would alter the free trading of evidence notes, as well as stakeholder views on how to manage the interaction of DRS packaging with the PRN system.

Key points for Members

Members will be encouraged to hear that some technical and administrative amendments are planned to help with the unpredictability of PRN prices and



the lack of transparency in the system.

Government intends to:

- Progress with the proposal to introduce mandatory monthly reporting of PRN/PERN volumes and price data
- Amend the current categories for revenue reporting by reprocessors to achieve greater transparency on the application of PRN income.
- Introduce an operator competence assessment for both compliance schemes and accredited reprocessors and exporters; and
- Place additional requirements on those who export material for PERNs

These will be introduced as part of the wider packaging EPR Regulations.

On the other hand, government has advised that:

- The trading period for PRNS/ PERNS will remain unchanged;

and

- It will not progress with the introduction of a compliance fee for packaging

In addition:

- Producers will continue to remain obligated to meet their packaging obligations through purchasing PRNs until the planned Deposit Return Scheme(s) (DRS) become operational. At this point Producers will need to collect DRS packaging under the DRS system, and the material will no longer be subject to compliance through PRNs or PERNs. However, how this will work in practice should the change of systems happen mid-year is not addressed in the response to the consultation.

The introduction of digital waste tracking, which is expected to be fully operational in 2024, will also provide additional data on waste as it moves through the system.

Read the full outcome [here](#):



07 | Industry news



Scottish Deposit Return Scheme (DRS) updates

Last week, the Scottish Government released published **new guidance for retailers of products in-scope of Scottish DRS**. This guidance ushers in expansions to the grounds upon which retailers can apply for an exemption from hosting a DRS container return point. For example:

- A new **Return Point Mapping & Exemption Support service** has been created to help retailers identify an alternative return point or declare they are willing to accept containers on behalf of any other nearby retailers with a takeback obligation that may wish to apply for an exemption
- The size of retail premises that will be nearly-automatically exempt from hosting a return point if they

apply for an exemption has been increased from 50m² to 100m², or if they are a food-to-go retailer with a footprint of 280m²

This was followed on 7 November by the publication of a policy paper, by Circularity Scotland, outlining some finer details of the Scottish DRS in respect of producer registration, data reporting and fee payments.

For access to these policy papers, please sign up for free with Circularity Scotland to receive updates [here](#).



Extended Producer Responsibility (EPR) update

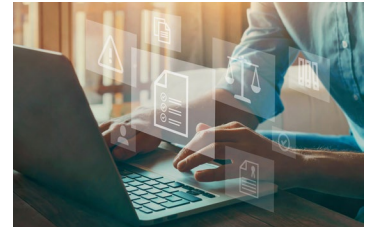
Deliberations between compliance schemes and DEFRA continue. New gov.uk guidance, outlining producer data reporting rules, as well as legislation confirming producer data reporting rules for the first extended producer responsibility reporting window in Q3 2023, are expected to be laid in parliament in December. Read more [here](#).

ERP can help your business to prepare

With EPR being the most significant shake-up of the UK's producer responsibility system in over 20 years, Producers will need access to timely updates and guidance to achieve a smooth EPR transition. We can help your business to prepare for these changes: "For EPR, think ERP!"

On the Events & Workshops page you will see details of monthly webinars we will be holding through 2023. If you have any other queries, please email: ukcompliance@erp-recycling.org or call 020 3142 6452. We will be happy to help.





08 | Compliance data

WEEE

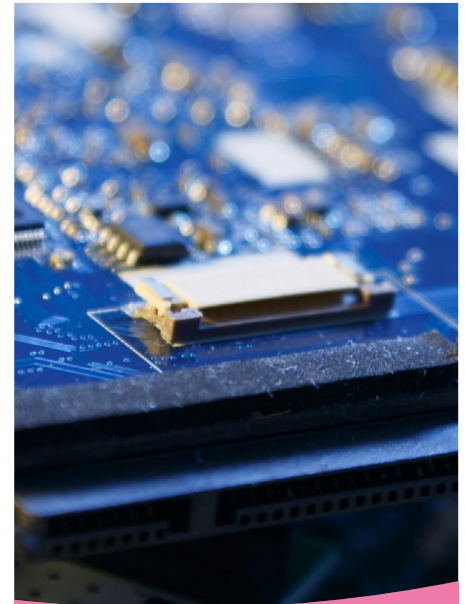
The latest data (Q3 2022 UK national data from the EA)

Volumes of EEE placed on the market (POM)

As the table below demonstrates, there was a clear reduction in the amount of EEE placed onto the UK market across more or less all categories in Q3 2022, when comparing against the same period last year (Q3 2021).

This is obvious in the table below:

	Category	B2C EEE placed on the UK Market Q3 2022 (tonnes)	Variance (Q3 2022 vs Q3 2021) (tonnes)	% Variance
1	Large Household Appliances	140,572	-18,509	-12%
2	Small Household Appliances	41,153	-1,710	-4%
3	IT and Telcomms Equipment	18,226	-276	-1%
4	Consumer Equipment	7,879	-87	-1%
5	Lighting Equipment	14,972	-527	-4%
6	Electrical and Electronic Tools	13,793	-7,328	-35%
7	Toys Leisure and Sports	13,440	-3,503	-21%
8	Medical Devices	995	-177	-16%
9	Monitor and Control Instruments	5,613	-106	-2%
10	Automatic Dispensers	50	-68	-58%
11	Display Equipment	20,685	-1,381	-6%
12	Cooling Appliances	54,067	-11,016	-17%
13	Gas Discharge Lamps/ LED	1,166	-517	-31%
14	Photovoltaic Panels	38,499	29,680	337%
	Total	371,071	-14,471	-4%



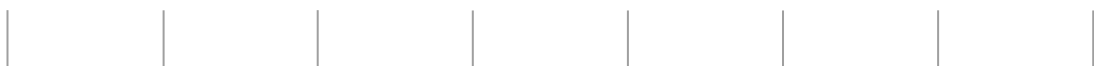
WEEE COMPLIANCE

Simplifying the recycling of waste electrical and electronic equipment

We take on your legal obligations, managing your registration and reporting, and securing WEEE evidence equal to your household recycling obligation.

We also provide registration and reporting for non-household EEE producers, as well as optional services for the take-back non-household products.

[Find out more here](#)





09 | Compliance data

Similar to Q1 and Q2 2022 data, it appears that only Lighting Equipment (Cat 5) and PV panels (Cat 14) recorded an increase in POM compared to the same period in 2021, with some categories, including Tools (Cat 6), Toys (Cat 7), Automatic dispensers (Cat 10) and Gas Discharge Lamps/LEDs (Cat 13), with over 20% decrease from the same time last year (Q3 2021). It's also worth noting that the two largest categories by weight - Large Household Appliances (Cat 1) and Cooling Appliances (Cat 12) decreased significantly from Q3 2021.

Volumes of WEEE collected (see table opposite)

Q3 2022 data indicates a 7% decrease of total volume of WEEE collected when compared to the same period last year. In fact, and much the same as we commented on with the Q2 2022 data, with the exception of Q2 2020 when covid-19 lockdowns halved collections, Q3 2022 is the lowest Q3 WEEE collected tonnage since 2009. As the table demonstrates below, collections of Large Household Appliances were significantly lower than this time last year (-13%), but all other streams are also down from Q3 2021.

Outlook for the compliance year

Looking at the Q3 volumes against the targets for 2022 shows most streams are falling short of the 75% that would be anticipated by this stage – with only display volumes ahead.

Category	B2C WEEE Collected Q3 2022 (tonnes)	Variance (Q3 2022 vs Q3 2021) (tonnes)	Variance (%)
Large Household Appliances	38,559	-5,163	-13%
Cooling Appliances	36,333	-2,879	-8%
Display Equipment	10,242	-81	-1%
Cats 2-10 Small Mixed WEEE	32,052	-453	-1%
Gas Discharge Lamps & LED Light Sources	1,025	-3	-0%
Photovoltaic Panels	57	2	4%
TOTAL	118,268	-8,577	-7%

Category	B2C WEEE Collected Q3 2022 (tonnes)	DEFRA targets 2022 (tonnes)	Progress to targets (%)
Large Household Appliances	123,482	183,867	-67%
Cooling Appliances	101,462	146,275	-69%
Display Equipment	30,789	39,705	-78%
Cats 2-10 Small Mixed WEEE	96,234	137,130	70%
Gas Discharge Lamps & LED Light Sources	3,026	4,145	-73%
Photovoltaic Panels	167	254	66%
TOTAL	355,160	511,376	69%



10 | Compliance data

Batteries

The latest data (Q3 2022 UK national data from the EA)

Volumes of Portable Batteries placed on the market (POM)

The Q3 2022 data also shows a decrease from this time last year (Q3 2021) and is the lowest volume of waste portable batteries collected in Q3 since 2017.

	Portable Batteries Placed on the Market		
	Q3 2021 (tonnes)	Q3 2022 (tonnes)	Variance (%)
Lead Acid	363	357	-2%
NiCd	37	46	26%
Others	10,150	8,152	-20%
TOTAL	10,550	8,555	-19%

Volumes of waste batteries collected

The Q3 2022 data shows a decrease from this time last year (Q3 2021), & the lowest volume of waste portable batteries collected in Q3 since 2017.

	Portable Batteries Placed on the Market		
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NiCd	37	46	26%
Others	10,150	8,152	-20%
TOTAL	10,550	8,555	-19%

Outlook for the compliance year

Based on the Q3 2022 data, the UK collection rate for 2022 (to date) is approximately 39%, which is 87% progress towards to the 2022 target of 45% - suggesting that the UK is on track to achieve the target.



Packaging Data

We have been following the UK's packaging recycling performance closely over the last 10 months. Overall, volumes recycled have been lower than in 2021, and only plastic seems to have made up some ground in Quarter 3 to pull closer to last year's level. This is good news as plastic is one of the materials that has been under a lot of pressure since we started the year. The other material is paper which is simply not coming through in sufficient volumes to help the UK achieve compliance easily. And over the last couple of months, we have also seen steel volumes drop below to what we would anticipate.

Here is the comparison of performances of all materials up to and including Q3, 2022, following the EA's publication of the last set of figures in November. With a recycling performance lower than required, PRN prices have been creeping up continuously throughout the year. This trend is set to continue over the few remaining weeks of the 2022 compliance year. It also means that we will start 2023 with higher PRN prices than we are





11 | Compliance data

used to seeing at the beginning of a compliance year.

Most materials have been affected by the increased cost of energy and demand for recycling is slowing down. Some materials are experiencing further pressures – the demand for paper packaging was consistently low throughout the year due to depressed consumer demand for new goods as a result of the cost-of-living crisis. Almost all Producers have a paper obligation, and the increased PRN costs will be felt by all. In addition, PRN prices for wood have also increased significantly even though the UK’s wood target has already been met. This is because wood PRNs are still needed to fulfil general recycling obligations and with paper volumes

low, and Paper PRNs at an all-time high, Wood is in demand.

It remains important for companies to have an as accurate as possible Packaging obligation in order not to overpay. Here ERP colleagues can help. We support several hundred companies with collecting packaging data and calculating packaging obligations so that they can be sure they are only purchasing the PRNs they need. If you think this may be of interest to you more information can be found on our website [here](#) or contact the Data Services team directly at: ukdataservices@erp-recycling.org

Merry Christmas and a Happy New Year from ERP’s Data Services team!

The Data Services team would like to wish all our customers a Merry Christmas and Happy New Year.

Whilst we don’t expect data submissions to be at the top of anyone’s ‘to do’ list over the festive period, please be aware that we will require your data for any upcoming submissions in the New Year.

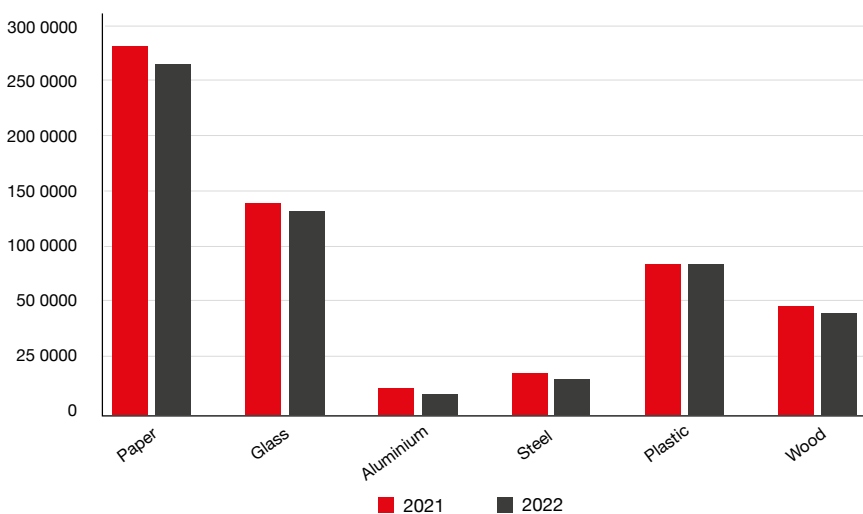
Data Services Account Managers will be sending out e-mail reminders and contacting customers in the coming weeks as well as providing lists of the data and information we require to complete your submissions.

If there have been any changes to your business structure or activities recently, please let us know as soon as possible as these may affect your data and submissions.

If you have any questions about your next submissions, please contact your account manager directly or the Data Services team at ukdataservices@erp-recycling.org

The Data Service team will be enjoying a well-earned festive break from the afternoon of 23rd December 2022, returning on 3rd January 2023.

Q1 - 3 2021 vs Q1 - 3 2022





12 | Featured article:



UK households are sitting on £5.6 billion of unwanted tech

Unwanted electrical gadgets worth £5.6 billion are being hoarded in UK homes, according to new research, as campaigners urge people to recycle devices to slow rising levels of e-waste.

An International E-Waste Day survey reveals that the UK is the third worst offending country, behind Netherlands and Italy respectively, for accumulating used, unused and broken small kitchen and household equipment, laptops and tablets.

Scott Butler, executive director of Material Focus, which runs the UK-wide 'Recycle Your Electricals' campaign, said: "There is a huge amount of value in a household's unwanted electricals, whether sold so that they can be reused, donated to help those in need or recycled."

"Electricals and tech are valuable,

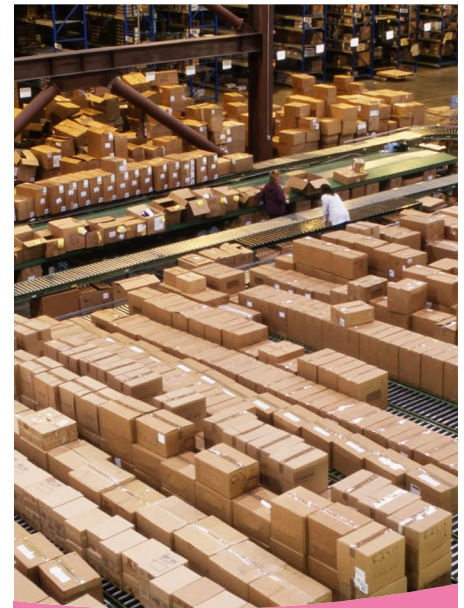
and this value will be lost forever if they are thrown away. Anything with a plug, battery or cable should always be recycled as a minimum."

Electrical waste contains rare and precious metals, like gold and neodymium, but around 155,000 tonnes of waste electricals are thrown away in the UK each year. Tech products featured significantly in the five most hoarded items with a staggering 11 million laptops and 9 million tablets that either have the potential to be passed on or recycled, USB sticks, cables and printers also ranked highly.

A separate survey by the WEEE Forum found 46% of people hoard electrical items because they think they may use them again in the future, 13% because the items have sentimental value, and 7% because they don't know how to dispose of them properly.

Recycle Your Electricals advises people to:

- remove batteries, bulbs, memory cards and data from devices
- separate their unwanted tech into 'sell', 'donate' and 'recycle' piles.
- sell on peer-to-peer marketplace where people keep most of the sale price.
- find their nearest recycling point [here](#).



PACKAGING COMPLIANCE

Simplifying the recycling of packaging

Our packaging compliance scheme simplifies all aspects of environmental compliance for companies handling packaging.

We will help you to accurately collect and submit your data, as well as ensure that the amount of recycling you are responsible for is achieved.

[Find out more here](#)



13 | Meet a team member: Chloe Grainger



marketing project planner to see what tasks need actioning that day. I have regular catch-ups with Justin to discuss our targets for the week and where we are with various projects.

Q What motivates you in your role?

A I always look to gain new skills and improve on what I already know. I do this by completing online courses and learning from my knowledgeable colleagues. Being in a role that allows me to be creative, enhance my professional development and work as part of a team is important to me.

Q What do you enjoy doing outside work?

A You'll most likely find me at a yoga class, wellbeing retreat, or wild swimming somewhere! I also love reading, painting, spending time with friends and going on scenic walks with my partner and our dog, Ozzy.

Q Your favourite music band(s)?

A I love 80s music – it was played a lot in our house when I was growing up and always brings back happy memories.

Q Favourite holiday destinations?

A Ibiza is so beautiful, particularly Cala Benirrás beach. Every Sunday, hundreds of people gather to watch the sunset and listen to local drummers – it's such an amazing experience!

Q How long have you been with ERP UK?

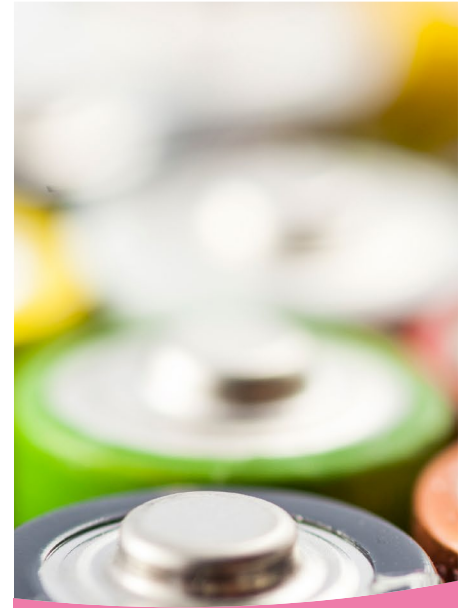
A I joined the Marketing & Communications team at ERP in February 2022.

Q Tell us about your experience before joining the ERP team?

A I worked in various customer service roles over the years, but soon realised I wanted something more creative. In 2017 I began working in a role at the University of Warwick supporting my team with social media and marketing before taking on a new challenge at ERP UK.

Q What does a typical day look like for you?

A I normally start the day by going through emails and looking at our



BATTERIES COMPLIANCE

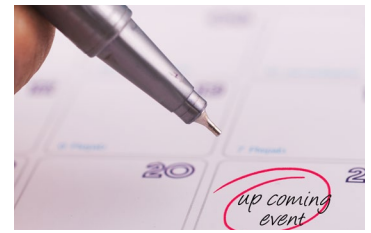
Simplifying the recycling of portable batteries

Our battery compliance scheme simplifies environmental compliance for companies making or importing batteries. We take care of all your legal obligations from registration and reporting to the collection and recycling of waste batteries. For small producers, we offer a simple 'all in' fixed cost.

Our solutions cover all aspects of battery recycling and can simplify processes for all businesses, small, medium, and large.

[Find out more here](#)





14 | Events & workshop diary



Environmental Services Association Conference | London | 22 February 2023

The 2023 ESA Conference will be focusing on the changing world of the waste sector. Hear from expert speakers on the impacts of upcoming changes and join in with facilitated live round table and dedicated workshops.

Visit the event website [here](#).

WEEE Conference | London 4th May 2023

Consultation on reforms to the UK's WEEE Regulations is now expected in the first half of 2023 - this conference was delayed from 2022.

Visit event website [here](#).



Awards for Excellence 2023 | The Grosvenor, London | 11th May 2023

The Awards for Excellence 2023 is forecast to be bigger and better than ever, with new categories and a new venue to mark the 20th Anniversary of the awards.

Visit event website [here](#).



ERP WORKSHOPS 2023

Our workshops provide detailed training for our members about the Regulations and how to apply them in your business.

They are **FREE** to attend and members give very positive feedback about their helpfulness.

For 2023 we plan a combination of online and face-to-face events.

WEEE & Batteries (Webinar) | 10am 1pm | Friday 6th January 2023

Learn about the current UK WEEE & Battery Regulations, data collection and reporting, your obligations as a Producer and as a Distributor.

Packaging (Webinar) | 10am – 2pm Monday 6th February 2023

Get in touch to book a **FREE** 2022 workshop with us.
ukcompliance@erp-recycling.org





15 | ERP's EPR glossary

AATF Approved Authorised Treatment Facility (for WEEE)	and NIEA)	PPT Plastic Packaging Tax
ABE Approved Battery Exporter	EEA European Environment Agency	PRN Packaging Waste Recovery Note
ABTO Approved Battery Treatment Operator	EFW Energy from Waste	PRO Producer Responsibility Organisation
AE Accredited Exporter (for Packaging)	ELV End of Life Vehicles	PS Polystyrene
AR Accredited Reprocessor (for Packaging)	EMS Environmental Management System	PVC Polyvinyl chloride
ATF Authorised Treatment Facility (for WEEE)	EPR Extended Producer Responsibility	RCV Refuse Collection Vehicle
BFR Brominated Flame Retardants	ESA Environmental Services Association	ROHS Restriction Of Hazardous Substances (in EEE)
CA site Civic Amenity (see also HWRC)	HDPE High Density Polyethylene	SEPA Scottish Environment Protection Agency
CIO Consumer Information Obligation (for Packaging)	HWRC Household Waste Recycling Centre	WAC Waste Acceptance Criteria
CIWM Chartered Institution of Wastes Management	LA Local Authority	WBA Waste Batteries and Accumulators
CSR Corporate Social Responsibility	LARAC Local Authority Recycling Advisory Committee	WCA Waste Collection Authority
DCF Designated Collection Facility (for WEEE)	MRF Materials Recovery Facility	WDA Waste Disposal Authority
DEFRA Department for Environment, Food and Rural Affairs	MSW Municipal Solid Waste	WEEE Waste Electrical and Electronic Equipment
DRS Deposit Return Scheme	NIEA Northern Ireland Environment Agency	WFD Waste Framework Directive
DOENI Department for the Environment Northern Ireland	NPWD National Packaging Waste Database (Batteries & Packaging)	WRAP Waste and Resources Action Programme
DTS Distributor Takeback Scheme (for WEEE)	NRW Natural Resources Wales	
EA Environment Agency (see also SEPA, NRW)	ODS Ozone Depleting Substance	
	PCB Polychlorinated Biphenyl	
	PCB Printed Circuit Board	
	PERN Packaging Waste Export Recovery Note	
	PP Polypropylene	

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

Packaging Regulations means The Producer Responsibility Obligations (Packaging Waste) Regulations 2017 (SI 2007/871)





16 | Get in touch

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

For general enquiries:

Phone: +44 203 142 6452

Email: uk@erp-recycling.org

For our WEEE, Batteries and Packaging Compliance Schemes:

Phone: +44 844 2480672

Email: ukcompliance@erp-recycling.org

For Data Services:

Phone: +44 844 2480672

Email: ukdataservices@erp-recycling.org

For International Compliance:

Contact: Rupert Foxall, EU Services Manager Call: +44 (0) 7825 119437

Email: rupert.foxall@erp-recycling.org

Our services

WEEE Compliance:

Simplifying the recycling of waste electrical and electronic equipment

Visit our webpage [here](#)

Batteries Compliance:

Simplifying the recycling of portable batteries

Visit our webpage [here](#)

Packaging Compliance:

Simplifying the recycling of packaging

Visit our webpage [here](#)

Data Services:

Simplifying your data and submissions

Visit our webpage [here](#)

Plastic Packaging Tax:

New tax on plastic packaging in the UK - April 2022

Visit our webpage [here](#)

