

## CONSULTATION ON REFORMING THE UK PACKAGING PRODUCER RESPONSIBILITY SYSTEM

### About us

Heart of London Business Alliance serves as the voice of 500 businesses and 100 property owners in the Piccadilly and St James's, Piccadilly Circus and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

### Our Response

The consultation addresses the current producer responsibility system, for which none of our members are direct manufacturers or directly affected by the implementation. However the retail, hospitality and entertainment businesses are affected in terms of the purchasing and disposal end of the supply chain.

The sectors mentioned are the businesses arranging and paying for the recycling or disposal of these materials at the end use of the chain, therefore extended producer responsibility (EPR) can help manufacturers to play a part in a more circular economy and reduce the pressure for end of line business to cover these costs.

Overall our member businesses recognise that EPR helps with the design and material input towards products, supplies and transport and therefore are supportive of these aims in order to reduce waste, which will in turn reduce the costs borne by our member businesses.

As per the other waste consultations out at the moment, changes in the system will encourage positive waste behavioural changes and a greater tool for educating the need to produce less waste for all involved in the process.

In order for this to be effective, larger businesses have called for no exceptions be offered to smaller businesses in order to ensure a fair and consistent approach.

Online market places act as a conduit for imported goods, with producers lying outside the jurisdiction of this system. Therefore, these market places should take responsibility for obligating importers to take a sustainable approach to packaging ensuring the positive environmental change is common across both high street and online sales

In summary the concept and implementation of enhanced EPR is supported by businesses where the cost is not passed onto in the end user with adverse or detrimental impacts and that the system promotes positive environmental changes.