

# Policy Objectives for Recovered Fibre Post-Brexit

## Introduction

UK-based paper mills use in excess of 3 million tonnes of Paper for Recycling (PfR) annually. The ready availability of high quality recyclate is a critical element in sustaining a successful industry that directly employs 62,000 people and contributes £12 billion to the economy.

The UK's departure from the European Union (Brexit) has exacerbated a government policy vacuum affecting stakeholders in the resource and recycling industries. The EC Circular Economy package launched in December 2015 became a key document in setting the future direction of travel for resource management and recycling in Europe and created a framework through which key policy issues were debated. The future status of this package and other European legislation is uncertain, but budgetary cuts and a desire for "small" government has progressively undermined capacity within Defra to create policy itself. The publication of the Government's own Resources and Waste Strategy for England has only gone part way towards settling direction for the future.<sup>1</sup>

## CPI Position

Future policy direction post Brexit is uncertain and likely to be the subject of debate in coming months and years. The Paper Industry considers the following policy objectives to be important in supporting the development of an appropriate high-quality raw material supply stream for reprocessing mills:

### Material Quality and Collection Systems

- EN643 recognised as the national operating standard
- CEPI EN 643 *PfR Quality Control Guidelines* adopted as the accepted methodology for procuring PfR
- Local Authority tenders to comply with EN643
- Simplification and Standardisation of "common elements" of Local Authority tenders
- Collection Consistency – Source separated (Dual

stream) collection for paper and board unless technically impossible

- Materials Recycling Facility Code of Practice (MRF CoP) properly policed with effective sanction for failing sites
- Properly policed Trans Frontier Shipment regulations to drive high quality recycling

A common UK interpretation of existing regulations across devolved administrations (NRW/EA/SEPA/NIEA)

### Extended Producer Responsibility (EPR)

- A revised EPR system be based around the "producer pays" principle
- A requirement that any new system does not financially disadvantage the Paper Industry
- Design for recyclability as a prerequisite for product labelling (See [CPI's Paper and Board Packaging Recyclability Guidelines](#))
- A modulated fee system to discourage excess or profligate packaging
- Some revenue to be channelled back to papermills to support technical developments and cover the costs of recycling "difficult" materials

### Recycling Targets

- Challenging but practical and achievable targets that optimise recycling whilst recognising diminishing environmental benefits as targets rise.
- Recognition that the fibre loop needs virgin fibre to maintain quality feedstock
- No mandated recycled content in paper products; adhere to the principle of "fit for purpose"

### End of Waste

- For paper, this should be defined as the point of entry into the pulper

### Strategy for Energy from Waste (EfW) capacity

- A national strategy for EfW & Residual Waste Treatment capacity
- A working standard for Refuse Derived Fuel (RDF)
- A requirement for RDF to be tested for recyclable material

<sup>1</sup>[Our waste, Our resources: A Strategy for England](#), published 2018.

- The extension of Landfill Tax into a Disposal Tax covering both landfill and Energy from Waste to prevent seepage of recyclable material into incineration

#### Health & Safety

- A continued commitment to improving industry standards in collaboration with the Health & Safety Executive through PABIAC

This document should be read in conjunction with the CPI Position Paper, [Paper for Recycling](#) and CPI's [Brexit and the UK/EU Free Trade Agreement](#) position paper.

#### Further Information

For further information on this issue please contact Simon Weston, Director of Raw Materials, on 01793 889605 or email [sweston@paper.org.uk](mailto:sweston@paper.org.uk).

#### Confederation of Paper Industries

- The Confederation of Paper Industries (CPI) is the leading trade association representing the UK's Paper-based Industries, comprising recovered paper merchants, paper and board manufacturers and converters, corrugated packaging producers, and makers of soft tissue papers.
- CPI represents an industry with an aggregate annual turnover of £12 billion, 62,000 employees, which supports a further 100,000 jobs in the wider economy.
- For facts on the UK's Paper-based Industries please visit: [www.paper.org.uk](http://www.paper.org.uk).

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