

Key principles for effective Extended Producer Responsibility systems

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EPR regimes must adequately assign control to Producers



- Producers cannot be expected to deliver outcomes/fund activities outside their scope of influence.

Includes:

- Operational arrangements
 - Procurement and selection of contractors
 - Access to waste
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- Unreasonable to make producers responsible for targets/costs outside their operational control

EPR regimes need pragmatic & realistic targets

- Targets needed when market forces can't deliver right environmental outcomes
- Set in context of environmental/societal benefit
- Visible up to 5 years ahead
- Target changes in steady/evolutionary manner



EPR regimes should be UK wide

- Businesses operate on a UK wide basis and EPR regimes should too.
- Producers cannot know where a product is eventually sold and used
- Economies of scale



EPR regimes must be genuinely competitive

The design of any EPR regime must avoid conflicts of interest and anti-competitive or market distorting behaviour

- Monopoly approach risks higher prices
- Eliminate opportunities for profiteering
- Avoid conflicts of interest where organisations have multiple roles



EPR regimes need to be adequately enforced

- Ensure that environment agencies and port authorities are adequately resourced
- Harmonised UK wide enforcement and charging essential
- Non-compliance through online marketplaces and fulfilment houses must be addressed



Online fulfillment houses must comply

- WEEE Scheme Forum checked up to 120 products on leading online marketplace
- Compliance of producers checked against EA website

Product	% non-compliant
LED light bulbs	76%
Tablet PCs	40%
Electric screwdrivers	54%
Fitness watches	88%
Hair care	50%
Display equipment	12%
Washing machines	8%

- Unfair competition damaging to compliant businesses
- Online retailers should take on responsibilities of “Producer” for product sold through their sites



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