

**From:** Duffy, Lucy <Lucy.Duffy@environment-agency.gov.uk>  
**Sent:** 21 November 2019 10:08  
**To:** Duffy, Lucy  
**Subject:** FW: Note to exporters

---

**From:** Packaging  
**Sent:** 07 September 2018 09:12  
**Subject:** Note to exporters



## 07 September 2018

### Note to exporters

Our compliance monitoring has shown that some exporters don't always know the final reprocessing site for the packaging waste they export to be recycled. We remind you that **you need to be able to show, on request and at audit, which sites (including EU/OECD sites) you have exported material to along with confirmation that they are the final reprocessor.**

If using an interim site you also need to keep records to show details of the site and an audit trail for what how much of your exported load was sent to the final reprocessor.

**For non-EU/OECD countries** you will have supplied the relevant broadly equivalent evidence for each final reprocessing site and had the site approved prior to recording the exports on your NPWD account. If an interim site is used then this must be included as part of the application for the site. We may ask to view and check this information on request and / or during an audit. You should ensure that any time limited evidence (i.e documents with an expiry date on) are valid for the time period of the export.

**For EU & OECD countries** you may have a whole country approved without naming specific sites or providing broadly equivalent evidence at the point of application. Although you are not required to name each individual site at application, as the exporter of the waste you must still be able to demonstrate, on request, that materials have been accepted and recycled by a specific appropriately permitted overseas reprocessing site. You must be

### Forward Look

#### 30 September 2018

In order for the Environment Agency to determine your application by 1 January 2019, your application should be submitted no later than 30 September 2018. You can apply after this date, but we cannot guarantee that your application will be processed in time to start from 1 January 2019.

#### 21 October 2018

Returns deadline for quarter 3

-----  
-----

able to show a full audit trail including details of any interim sites and evidence of the broadly equivalent status of any final reprocessing site.

It is a legal requirement to fully complete the Annex VII (Article 18) movement document including the details of the recovery facility. Where this is an interim site, you must provide a full audit trail to the final reprocessor including details of all interim sites and evidence of the broadly equivalent status for all final reproducers as the Annex VII will not contain sufficient detail in isolation.

It is the responsibility of the exporter to ensure that they are compliant with the Transfrontier Shipment Regulations 2007 as amended and any other relevant legislation at all times. This applies whether PERNs are issued or not and is a condition of accreditation.

## Interim sites

If you export UK packaging waste to a different site before it reaches the final reprocessing site then this is called an interim site. You **must** supply details of all interim sites either at application, or mid-year if the situation arises, and you **must** be able to supply details of the waste's final destination.

If you cannot supply all relevant information about the final reprocessing sites, and interim sites if applicable, then you cannot issue PERNs on this material. If you are found to have issued PERNs on this material then your accreditation may be suspended and/or cancelled and you may also have to cancel PERNs.

## Examples

- **Scenario where waste should not be recorded on NPWD and PERNs should NOT be issued**
  - Accredited exporter has Poland approved for their plastic accreditation. The exporter sends 100 tonnes of wholly plastic material to a site in Poland which then performs a sorting activity on the material before sending it to be fully reprocessed. The exporter does not know exactly how much material is sent to which final reprocessor & cannot provide details of all of the final reprocessing sites. The exporter adds 100 tonnes of plastic on their waste recording on NPWD.
- **Scenario where waste should not be recorded on NPWD and PERNs should NOT be issued**
  - Accredited exporter has Poland approved for their plastic accreditation. The exporter sends 100 tonnes of material to a site in Poland which then performs a sorting activity on the material before sending it to be fully reprocessed. The waste is very dirty and contains non plastic materials such as used beverage cans. The waste is stopped during a ports inspection. The exporter adds 100 tonnes of plastic on their waste recording on NPWD. This scenario would not only breach the packaging regulations but also TFS.
- **Scenario where PERNs may be considered (the exporter must be able to show the load was clean with no non-target materials.)**
  - Accredited exporter has Poland approved for their plastic accreditation. They have confirmed prior to export that ABC

## Got something to tell us or want to give feedback?

Get in touch with the packaging team on 0208 474 7609 or [email here](#)

## Reporting Freeriders

You can anonymously report freeriders through the Crimestoppers website [here](#) or by calling Crimestoppers on 0800 555 111.

## Tell them

- it is an environmental crime
- the offender's company name and address and Companies House number (if known)
- describe the criminal activity you suspect – that they are not complying with the packaging waste regulations
- any information on why you feel the company is not complying with the regulations

Company Ltd perform the final reprocessing activity on the plastic. The load is steel strapped clean plastic packaging of one material type with no non target materials. They export 100 tonnes of UK plastic packaging waste to ABC Company Ltd and add 99.85 tonnes of plastic onto their waste recording on NPWD (as they deduct 0.15% for the steel banding).

- **Acceptable scenario**

- Accredited exporter has Poland approved for their plastic accreditation. They have confirmed prior to export that ABC Company Ltd perform the final reprocessing activity on the plastic, but that DEF Company Ltd performs further sorting on the material first by separating out polymer types. The exporter informs the Environment Agency that they are using DEF Company Ltd as an interim site and provides the details of both companies. They export 100 tonnes of UK plastic packaging waste to DEF Company Ltd. DEF Company Ltd inform the exporter of the tonnage of UK plastic packaging waste sent on to be reprocessed at ABC Company Ltd. The accredited exporter adds the figure from DEF Company Ltd onto their waste recording on NPWD.
- If an interim site sends packaging waste to several final reprocessors, the accredited exporter must know the weight of UK packaging waste sent to each final reprocessor (and the site details) in order to issue PERNs accurately. If the accredited exporter does not know all of these details then they will be unable to meet their conditions of accreditation.

### **Queries?**

If you have any queries, please contact the packaging producer responsibility team at [packaging@environment-agency.gov.uk](mailto:packaging@environment-agency.gov.uk) or on 0208 474 7609.