

Plastic Waste Exports Position



In January 2023, the UK Government rejected the Environment, Food and Rural Affairs (EFRA) Select Committee's [report](#) of their inquiry into plastic waste recommendation to ban all exports of UK plastic waste by the end of 2027, and stated that legitimate exports have a role in the management of the UK's waste.

Following this, RECOUP has issued this position statement on exporting plastic waste for recycling. It focuses on the logical steps for the UK to achieve a best-in-class recycling infrastructure, and is based around five key points:

- ✓ Reducing reliance on plastic waste exports in line with developing a roadmap to grow UK plastic recycling infrastructure and capacities.
- ✓ Not supporting plastic waste being exported for recycling for economic reasons when it can and should be treated in the UK.
- ✓ Supporting the intended ban on exporting material to non-OECD countries.
- ✓ Currently supporting the export of plastic waste to OECD countries, including EU Member States, only as long as the infrastructure is in place to handle it, and there is evidence that the route the material takes meets circular outcomes.
- ✓ Focus on ensuring that illegal, unethical or unnecessary exports are stopped.

Plastic export recycling markets should be utilised where necessary to achieve the best environmental outcomes, and failure to recycle this material in the UK highlights a need for greater investment in UK plastic recycling infrastructure.

RECOUP supports the principle behind the UK reducing the plastic waste it exports for recycling, but in a way that acknowledges the capabilities and limitations of the domestic recycling infrastructure. Export of material should not be treated as a substitute or hinder the investment in the growth of infrastructure, and as such the UK should continue to progressively work towards the reduction of the quantities being sent overseas for recycling.

Whilst export of plastic waste presents risks, challenges and additional environmental considerations, a ban on export in its entirety when looking at the UK's current plastic recycling infrastructure would mean that large quantities of 'hard to recycle plastics' would go to non-circular end markets, such as energy from waste or landfill.

The foundation for this position is outlined as follows.

1) Approaches for Recycling in EU Member States, OECD and Non-OECD Countries

RECOUP believes that export of plastic waste to OECD countries, including EU Member States, should only be allowed in two instances:

- Where the infrastructure is both known to be in place and of sufficient quality and capacity to effectively handle it; and
- An equivalent recycling outlet isn't currently available in the UK.

As such, 'OECD countries' should not be used as a catch-all term for appropriate receiving destinations, and instead exports should be permitted based on the country's capabilities to recycle the material.

RECOUP supports the ban on export of all waste types to non-OECD countries. Whilst it's important not to get overly caught up in the media coverage of instances where UK waste has been found to be illegally handled and mis-managed, it draws attention to the broader issue of the limitations in terms of waste and recycling infrastructure in these developing countries. It also highlights the possible exploitation of these destinations for cheaper labour markets, and inadequate waste regulations which risks the material going into the natural environment as litter or incinerated. Although often less economically attractive, management of these materials should be done utilising infrastructure within Europe, if not within the UK itself.

2) Revisions to the Packaging Export Recovery Note (PRN)

RECOUP would support revisions to the current Packaging Recovery Note (PRN) system that would change the incentivisation of exporting plastic packaging waste for recycling. At present, material recycled in the UK is measured at the point that the recycling has taken place once any contamination or non-target material has been removed and material yield losses in the recycling processes have taken place. Material that is exported using Packaging Export Recovery Notes (PERN) includes the weight of any contamination or non-target material that may be lost in the recycling steps that take place overseas, prior to reaching any end-of-waste status.

Removing the economic variable between PRNs and PERNs based on the point the note is claimed will make UK recycling more economically attractive to recyclers and balance the market. RECOUP believes robust research is needed that would enable PERN values to be adjusted so they are reflective of the assumed material yield losses.

3) Need for Robust Evidence and Verification

When the export of plastic waste is permitted, RECOUP supports robust requirements that are met to ensure the receiving destination has the appropriate regulation and infrastructure to recycle the material to sufficient standards. This includes ensuring that the route the material takes is traceable, and that audit trails are planned and documented so that evidence can be provided to verify claims about it meeting circular outcomes at end of waste. These standards should cover the full journey of the material, not simply 'one step' from leaving the UK.

4) Fit for Purpose Enforcement Against Illegal Activity

There should be a clear distinction between legal and illegal activity. It can be assumed that changes in legislation and restrictions will impact illegal export activity to some degree, but by definition this type of activity will operate outside of any legal structure and regulation. As such, it's important to

focus on ensuring that unethical or unnecessary exports are stopped. It should be noted that regulatory changes and restrictions on exporting material should not be seen as a single solution of resolving the wider issue of waste crime, but ongoing, adequate and fit for purpose enforcement is essential to enable long-lasting and meaningful change.