



**Northern Ireland
Producer Responsibility Obligations
(Packaging Waste) Regulations**



**NIEA
Compliance
Monitoring
Plan for
2010**

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1.0 BACKGROUND

1.1 Introduction

The Producer Responsibility Obligations (Packaging Waste) Regulations (SR/1999/115) were introduced in Northern Ireland in 1999 as part of the UK implementation of the EC Directive on Packaging and Packaging Waste (94/62/EC). The Directive seeks to reduce the impact of packaging on the environment by setting mandatory targets for the recovery and recycling of packaging waste for Member States to achieve. By placing these obligations on business, the Packaging Waste Regulations encourage minimisation and reuse of packaging, reduce landfill disposal of packaging wastes and support the development of the packaging waste recycling sector.

The Directive was amended in 2004 (2004/12/EC) to set a target of 60% recovery of packaging waste by 2008. Northern Ireland has no specific targets but the data from businesses registered in Northern Ireland feed into the UK target as the Member State. In 2008, the total amount of UK packaging waste was estimated at 10.695 million tonnes and the total amount of packaging recovered was 7.03 million tonnes yielding a recovery rate of 65.7% (see www.defra.gov.uk/environment/waste/producer/packaging). There are also Directive targets for the recycling and recovery of specific packaging materials: Paper/Cardboard; Plastic; Glass; Metal and Wood.

1.2 Obligated Businesses

The Packaging Waste Regulations in the UK place the responsibility for meeting the Member State's targets on business. To minimise bureaucracy and focus effort on those companies that handle the vast majority of packaging, the Packaging Waste Regulations only affect businesses that exceed certain thresholds. The Packaging Waste Regulations place a legal obligation on all businesses with an annual turnover of more than £2 million and who handle more than 50 tonnes of packaging each year. Companies that exceed both thresholds are known as 'producers'. Producers are required to:

- Register and submit data to the Northern Ireland Environment Agency (NIEA) by the 7th April each year. An operational plan should also be submitted if the producer has a recovery obligation of more than 500 tonnes;
- Fulfil their specific recovery and recycling obligations;
- Submit a Certificate of Compliance by 31st January each year and support this with evidence that the required packaging waste recovery and recycling has been carried out; and
- Meet certain 'consumer information obligations' if the main activity of the company is 'seller'.

Alternatively, producers may join a compliance scheme that will meet their obligations on their behalf. During the 2009 compliance year, there were 11 GB based and 1 Northern Ireland based compliance schemes registered with

NIEA. An up to date list of registered compliance schemes is available via the NIEA website at www.ni-environment.gov.uk/waste.

Compliance Schemes registered with NIEA

<ul style="list-style-type: none"> • Biffpack • Budget Pack • Compliance Link • Complypak • DHL Packaging Compliance • Nipak 	<ul style="list-style-type: none"> • Paperpak • Recycle 1st • Recycle-Pak • Valpak • Veolia Environmental Services • Wastepack
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Recycling and recovery targets on obligated producers have been progressively increasing since 1999. Because not all businesses are obligated (small businesses below the thresholds are exempt), those obligated producers above the thresholds have to recover more packaging waste to enable the Member State to meet its targets. To ensure the UK recovers over 60% of packaging waste, the overall recovery target on obligated businesses increased to 73% in 2009. Material specific targets were also increased.

Recovery and recycling of packaging waste is carried out by reprocessors and exporters of UK packaging waste. Only reprocessors and exporters that are accredited and monitored by the Environment Agencies (EA, SEPA and NIEA) may generate evidence of recovery in the form of Packaging Waste Recovery Notes (PRNs) or Packaging Waste Export Recovery Notes (PERNs) for each tonne of packaging waste that is reprocessed or exported. Packaging waste reprocessors and exporters that are not accredited are not allowed to issue evidence of recovery. During the 2009 Compliance year, there were 7 accredited reprocessors and 9 accredited exporters registered with NIEA. This can change over the year and an up to date list is available via the NIEA website at www.ni-environment.gov.uk/waste.

Reprocessors and Exporters accredited by NIEA

Reprocessors	Exporters
<ul style="list-style-type: none"> • Eglinton (Timber Products) Ltd • Huhtamki (Lurgan) Ltd • Kosmos Recycling Ltd • Quinn Glass Ltd • Re-Gen Ltd • Spanboard Products Ltd • Urban Forest Ltd 	<ul style="list-style-type: none"> • Allclear Environmental • BJ Bannside Recycling • Cherry Polymers Ltd • Clearway Ltd • Glassdon Recycling • Greenway (Ireland) Ltd • Re-Gen Ltd • Seaforde Scrap Metals • T-Met Ltd

Obligated producers and compliance schemes must meet their recovery and recycling obligations by buying or obtaining the correct amount of PRNs and PERNs. Reprocessors and exporters are expected to use the income from the sale of PRNs and PERNs to enhance packaging recycling, e.g. to improve collection systems, increase recycling capacity and develop end use markets.

1.3 Changes to the legislation

The original Producer Responsibility Obligations (Packaging Waste) Regulations (Northern Ireland) 1999 have been amended several times to introduce various technical changes and progressively increase the recovery targets. A consolidated set of regulations came into operation in 2007 and are referred to as the Producer Responsibility Obligations (Packaging Waste) Regulations (Northern Ireland) 2007 (SR/2007/198).

Since 2007, there have been two amendments to the regulations: to increase the overall recovery and material-specific targets up to 2010; and to clarify the requirements for exporters to demonstrate that reprocessing which occurs overseas takes place under environmental standards 'broadly equivalent' to the EU.

In June 2009, Defra and the Devolved Administrations published a strategic review of packaging policy 'Making the most of packaging'. This document sets out the vision for packaging policy over the next decade and contained a number of specific policy proposals, including increased targets. It is expected that there will be a consultation in 2010 on proposed increases in targets for the period 2011 to 2020.

1.4 The Duty to Monitor Compliance

Regulation 31 of the Packaging Waste Regulations places a duty on NIEA to monitor compliance in Northern Ireland. This duty covers:

- obligated producers (direct registrants and members of schemes);
- non-obligated businesses who may exceed the thresholds (potential 'free riders');
- compliance schemes; and
- accredited reprocessors and exporters

The monitoring duty covers compliance with the legal obligations of all the businesses affected by the Regulations. A key issue to check is that all the information and data provided to NIEA are 'as accurate as reasonably possible'. Monitoring activities are discussed in more detail in Section 2.

1.5 The Duty to Provide a Monitoring Plan

The Packaging Waste Regulations include a requirement for NIEA to publish an annual compliance monitoring plan.

Regulation 32 states that the Department shall take such steps as seem to it appropriate to publish, in relation to each year, the following details of the monitoring carried out under regulation 31 –

- a) the Department's policy in relation to the monitoring it is required to carry out under regulation 31; and
- b) an indication of the minimum number of persons which it proposes to monitor in the course of that year.

2.0 MONITORING ACTIVITIES

2.1 Registered Producers

Registered producers include those businesses that register directly with NIEA and those that register via a compliance scheme. There are two main components to compliance monitoring of obligated producers: office based data checks and site audits.

Site visits are a key aspect of effective compliance monitoring as they enable the regulator to observe business processes first hand, investigate packaging flows (inputs and outputs) and ascertain in detail how the data submitted to NIEA have been derived. Based on hundreds of visits to many different businesses and regular liaison with the other Agencies, the NIEA compliance team has built up valuable experience on packaging data issues. Site visits can often result in additional packaging materials being identified for inclusion in future data submissions (e.g. transit packaging, bespoke packaging, packaging imports, etc). The site visit will investigate how data on packaging weights are extrapolated to derive figures for the total amount of packaging handled by the business, e.g. based on purchasing data, production data, sales data, etc. The site audit will also investigate and confirm the role of the business in terms of packaging flows between manufacturer, converter, pack filler and seller. For example, some manufacturing companies may not realise they are the seller of transit packaging to their customers, if the latter are the end users who discard the packaging. Helping businesses to understand how to treat imports and exports of packaging is also a key issue.

As a general rule, if a discrepancy of less than 10% of the packaging handled is identified, the business is advised to take on board the recommendations of the NIEA audit in their submission for the next compliance year. If the discrepancy is greater than 10%, the business is required to provide a re-submission and pay an additional fee. A compliance visit can also result in a decrease in obligated packaging, for example, where a business has neglected to subtract packaging which is exported and does not enter the UK waste stream. The objective of NIEA is to make sure that the packaging data submitted are as accurate as reasonably possible.

It is the aim of NIEA that a producer will be routinely audited about once every three years. Following a risk based approach to monitoring, there are a number of reasons why more frequent audits may be required:

- Erroneous data were submitted in the previous year requiring a re-submission and there are still concerns about the accuracy of the data;
- The producer has failed to take account of previous audit recommendations from NIEA in their data submission;
- The producer has failed to purchase the required PRNs in the previous compliance year;
- The producer has failed to submit the required certificate of compliance;

- The producer is a newly registered business and is still uncertain about the requirements of the regulations;
- There are significant and unexplained differences from the previous year's data;
- There have been significant changes to the business (e.g. takeover of another business) indicating that a new baseline for the amount of packaging handled by the business needs to be established;
- The producer requests a compliance visit to help them improve the accuracy of their data submission.

Taking account of the reasons listed above, the overall outcome will be that producers that provide an accurate, soundly based and well explained data submission will receive less frequent audits than businesses that don't. Normally site visits are pre-arranged with the registered producer. This enables relevant information to be made available for the visit. However there may be occasions when unannounced compliance monitoring visits are deemed to be necessary.

The second main component of compliance monitoring is office based checks. The process of monitoring starts with the receipt of annual registration data in April each year via the National Packaging Waste Database (NPWD). The NIEA Producer Responsibility team is responsible for checking registrations and updating NIEA records. The process of data review includes logic checking to ensure that data in the various tables in the application are not contradictory and also that the recovery and recycling obligations appear correct. In addition business type and description are cross-referenced to declared activities to ensure that the appropriate packaging handling roles have been identified. Data are compared with previous years' submissions to note any trends, e.g. has an increase in turnover resulted in an increase in packaging handled. Previous site audit reports will also be consulted to check that the producer has taken on board any recommendations from NIEA to improve the quality of the data. There may also be comparisons with similar sized businesses within the same industrial sector as a broad check on the scale of the figures. Any errors or concerns with the registration data are noted and the producer will either be asked to revise their application or they will be included in the list of producers requiring a compliance monitoring site visit that year.

Visits to both direct registrants and scheme members are preceded by preparatory work, which includes NIEA compliance officers reviewing current and previous registration data forms, any previous requests for re-submissions and any advisory guidance given in previous communications.

All direct registrants must submit an annual Certificate of Compliance (CoC) by 31st January each year via NPWD. This states whether or not the business has met its recovery and recycling obligations for the previous registration year.

Direct registrants are monitored to check that CoCs have been submitted on time, that they contain the correct information and that there is appropriate

evidence of compliance to back up the CoC. The CoC is also checked to ensure that it has been submitted by the approved company representative. Any queries are followed up fully either by telephone or letter.

2.2 Non-obligated businesses - potential free riders

Since the commencement of the Packaging Waste Regulations in 1999, NIEA has built up a database of over 1800 businesses that may be producers as defined in the regulations. This database has been assembled from a range of different sources such as business directories and databases; liaison with other government bodies and official organisations; local intelligence; feedback from compliance schemes and businesses.

Over 400 businesses are registered as obligated producers. This leaves approximately 1400 companies that are not registered. Unregistered businesses can be divided into two groups:

- Businesses that have provided relevant and accurate information to NIEA and are legitimately under one of the two thresholds tests: less than £2 million turnover or less than 50 tonnes of packaging handled; and
- Businesses that exceed the two thresholds defined in the Packaging Waste Regulations. Only this latter group are free riders.

Free riders may have provided inaccurate or incomplete information to NIEA either deliberately to avoid their legal obligations or through a misunderstanding of the requirements of the regulations. For example, a common error is that businesses provide a data submission based on the amount of waste packaging they produce rather than the amount of packaging material they handle as a business. Some free riders will not have been identified by NIEA and so will not be listed in our database but may emerge as a result of our investigations during the year.

NIEA's free rider monitoring strategy is a combination of written requests for information and site visits.

- Every year NIEA sends out a data questionnaire to non-obligated businesses on our database, seeking information on turnover and packaging handled. This is targeted at businesses most likely to be close to or over the thresholds. This is normally sent out in January and if the information returned indicates that the business is above the thresholds, they are advised to join a compliance scheme or register direct with NIEA by the 7th April deadline.
- NIEA carries out a programme of follow up checks and site visits on businesses that are potential free riders. This will include businesses that have not responded to a request for data; businesses that appear to have provided an erroneous data return; businesses that appear close to the thresholds; businesses that have been identified by local intelligence or feedback from third parties. Currently NIEA's approach is to carry out a level of non-obligated business checks greater than the level of audits of registered producers.

Once a free rider is identified, they are required to register immediately for the current compliance year.

Some of the businesses legitimately below the thresholds also need ongoing monitoring as past data trends on turnover or packaging handled indicate that they are projected to exceed the thresholds in the future. Other businesses, that have no prospect of exceeding the thresholds, have their details archived so that they are not subjected to ongoing routine monitoring. About 980 of the 1400 non-obligated businesses have been archived in this manner, leaving approximately 400 businesses as the key target group for free rider monitoring.

2.3 Compliance Schemes

Monitoring of compliance schemes consists of two main components: analysis of submitted information and site audits. Analysis of submitted information includes:

- Review of the scheme's operational plan;
- Review of the scheme's annual registration data;
- Review of changes in membership;
- Review of any significant changes in the scheme's recovery and recycling obligations and the underlying reasons for these changes;
- Review of individual member's data.

NIEA has a particular interest in how GB based schemes communicate with their NI based members and how they check their data and update them on any changes to the regulations. NIEA strongly encourages schemes to conduct a thorough site audit when they sign up new members and also to take appropriate action to rectify weaknesses in their systems when a member is required to provide a re-submission.

The strategy for site visits to monitor compliance schemes needs to balance resources against the risk and potential impact of failure to comply, because most of the schemes are GB based and therefore it is more expensive and time consuming for NIEA to conduct a monitoring visit. NIEA co-ordinates scheme audits with SEPA and EA wherever possible.

Key issues that are investigated during site visits include:

- the systems the scheme uses to check the accuracy of their members' information and data;
- the scheme's data management systems;
- progress against the actions in their operational plan;
- the statement of compliance for the previous year and the acquisition records of PRNs and PERNs that support this.

2.4 Compliance with consumer information obligations

These obligations affect companies whose main activity is ‘seller’ of packed products to end users. These companies must, either individually or through a compliance scheme acting on their behalf, inform NIEA of the methodology they are using to notify their customers about:

- the return, collection and recovery systems available to consumers - for example a list of local recycling facilities and initiatives;
- the consumers’ role in contributing to reuse, recovery and recycling of packaging and packaging waste - for example encouraging customers to reuse plastic bags;
- the meaning of markings on packaging existing on the market - for example provision of a list of relevant symbols which may aid the purchase of recycled or recyclable goods; and
- the appropriate elements dealing with the management of packaging and packaging waste in the Waste Management Strategy for Northern Ireland.

Each year, NIEA will monitor all compliance schemes and a sample of direct registrants, whose main activity is that of seller, to determine the methodology used by them to comply with these obligations.

2.5 Accredited Reprocessors and Exporters

NIEA monitors accredited reprocessors and exporters to ensure that PRNs and PERNs are only issued in accordance with the requirements of the regulations. As these evidence notes have a monetary value as a result of the packaging regulatory system, effective monitoring is key to minimise the risk of fraudulent issue of PRNs and PERNs. Monitoring is focused on the following key issues:

- the material accepted for reprocessing or export is packaging material;
- the packaging is UK waste only;
- the recording of input and output weights are accurate; and
- the operator has accurate data and management systems for tracking material through the process.

Compliance monitoring is a combination of office based checks and site audits, and includes the following activities:

- review of the annual application to be an accredited reprocessor or exporter;
- review of the sampling and inspection plan;
- review of the three year business plan for investment of PRN and PERN income;

- review of quarterly and end of year data returns on the amount of packaging waste received and PRNs and PERNs issued;
- for exporters of packaging waste, review of evidence that overseas reprocessing will be carried out under conditions 'broadly equivalent' to the environmental standards that apply in the European Union;
- pre-application site visit (for operators that have not been accredited before);
- pre-arranged annual audit with detailed review of on-site processes and data management systems; and
- periodic, unannounced spot check visits during the year to check data accuracy and ongoing compliance with the conditions of accreditation.

2.6 Provision of advice and guidance

Although this report is focused primarily on monitoring activities, it is noted that NIEA continues to provide advice and guidance to businesses and other organisations, which contributes to the level of compliance with the Packaging Waste Regulations.

This includes a range of activities such as: responses to telephone and e-mail queries; advisory visits; website updates; guidance documents and leaflets; workshops and seminars. Guidance is provided to existing registered producers, non-obligated businesses, trade bodies, consultants, compliance schemes, accredited reprocessors and exporters and other waste management operators that are potential reprocessors and exporters.

3.0 REPORT ON MONITORING ACTIVITIES FOR 2009/10

3.1 Monitoring visits

The number of monitoring site visits and audits conducted by NIEA in 2009/10 to the different businesses affected by the Packaging Waste Regulations are summarised in the table below.

Type of visit	Target	Achievement at Dec 2009*	End 2009/10 projection
Registered producer audits	100	90	100
Non-obligated business visits/checks	200	97	150
Compliance scheme audits	6	7	7
Accredited reprocessors/exporters annual audits	9	16	16
Accredited reprocessors/exporters spot checks	9	24	24

* As at 15 December 2009

The following points are noted:

- NIEA is committed to ensuring a level playing field for those businesses that are registered and every year the level of monitoring of potential free riders is greater than the level of producer monitoring.
- As reported in last year's monitoring plan, there was a significant effort to focus on unregistered business in 2008/09 and obtain a response from all businesses to the data questionnaire. This exercise clarified the status of many businesses and resulted in a large number being archived in the monitoring database, with no need for further routine monitoring. The result has been that there is a much smaller pool of unregistered businesses to check this year. Many have been visited within the last year or two and are currently below the thresholds. Therefore, the target for non-obligated business checks has been reduced from 200 to 150.
- NIEA monitoring has identified 13 new businesses that needed to register as producers in 2009 or will have to register for the first time in 2010.
- With 100 producer audits undertaken or planned, approximately one quarter of the 412 registered producers will be audited in 2009/10. This monitoring programme includes a representative selection of direct registrants and scheme members.
- As a result of NIEA checks and auditing, 5 producers were required to provide a re-submission for compliance year 2009. Two of these were direct registrants and three were members of schemes.
- Seven audits of Compliance Schemes were conducted in 2009 in conjunction with the Environment Agency and/or SEPA.

- All 16 accredited reprocessors and exporters received a full annual audit during 2009. In addition, all of the accredited businesses received at least one spot check visit during the year.
- In addition 10 advisory visits were provided to waste companies that had expressed an interest in becoming an accredited reprocessor or exporter.

3.2 Office based monitoring

Although site visits are a key component of an effective compliance monitoring strategy, a number of important monitoring activities can be carried out in the office based on the data submitted by the different businesses affected by the Packaging Waste Regulations. These activities are summarised in the table below.

Activity	Target	Achievement at Dec 2009	End 2009/10 projection
Direct registrants registration data review	109	105	105
Compliance schemes registration data & operational plan review	12	12	12
Direct registrants certificate of compliance review	105	-	105
Compliance schemes statement of compliance review	12	-	12
Accredited reprocessors/exporters quarterly and annual data returns for 2009 reviewed	9	16	16
Accredited reprocessors/exporters applications for 2010 assessed	9	14	14

4.0 MONITORING PLAN FOR 2010/11

4.1 Monitoring visits

NIEA will plan and implement our monitoring activities to try to minimise the regulatory burdens on business and to provide help and guidance to individual businesses wherever possible. Given current economic conditions, it is expected that the number of registered businesses will remain fairly static. NIEA will work closely with relevant government departments and the other agencies to support the recycling sector.

The number of monitoring site visits and audits planned by NIEA in 2010/11 are summarised in the table below.

Type of visit	Number of visits
Registered producer audits	100
Non-obligated business visits/checks	150
Compliance scheme audits	4
Accredited reprocessors/exporters annual audits	14
Accredited reprocessors/exporters mid year spot checks	14
Suppliers of packaging materials to accredited reprocessors/exporters	3

As with previous compliance years, there is a higher level of free rider monitoring relative to the level of registered producer audits. Monitoring of unregistered business will focus primarily on businesses that appear to be close to or over the thresholds, but any companies that are far below the thresholds will also be checked and archived from the NIEA database if appropriate. If archived, these businesses will not be required to complete the annual data questionnaire.

As discussed in Section 3.1, due to our recent monitoring activities the pool of unregistered businesses in the NIEA database that require ongoing monitoring has fallen to around 400 businesses. Many of these have been visited in the last year or two, and so may not need another visit in 2010. Two new information sources will be utilised in 2010 to expand the list of businesses that may require further investigation as potential obligated producers.

- A consultants' report on businesses in Northern Ireland likely to have a turnover over £2 million has been produced for NIEA. This utilised the Mint UK Business Intelligence and other government and media information sources to identify businesses operating in Northern Ireland. SIC codes have been used to identify the sectors that are likely to handle

the most packaging. This has helped to identify approximately 120 businesses that merit further investigation.

- Following discussions with the other Agencies, other financial and business information sources have been used to identify an additional 400 businesses operating in Northern Ireland that merit further investigation. This information has been analysed and mapped with assistance from Ordnance Survey Northern Ireland and compared with a mapping of our existing registered producers. This information will be used to plan a targeted programme of site visits which will commence in 2010/11.

4.2 Office based monitoring

In addition to the monitoring visits outlined in Section 4.1, the following office based monitoring activities will also be undertaken:

Activity	Target
Direct registrants registration data review	105
Compliance schemes registration data & operational plan review	12
Direct registrants certificate of compliance review	105
Compliance schemes statement of compliance review	12
Accredited reprocessors/exporters quarterly and annual data returns for 2010 reviewed	14
Accredited reprocessors/exporters applications for 2011 assessed	14

5.0 ENFORCEMENT

The Producer Responsibility Unit enforces the Packaging Waste Regulations in accordance with the published NIEA Enforcement Policy (see www.ni-environment.gov.uk). The enforcement options available to NIEA include: issue of warning letters, issue of formal notices, formal caution and prosecution. In addition, NIEA can refuse to register a compliance scheme, grant conditional approval or withdraw approval. NIEA can also require a direct registrant to register via a compliance scheme. Reprocessors and exporters can have their accreditation suspended or withdrawn.

Regulation 40 of the Packaging Waste Regulations 2007 sets out offences and penalties. Where an offence has been committed, the choice of enforcement response will be assessed on a case by case basis and will take into account the issues set out in the NIEA Enforcement Policy. Part 6 of the Regulations sets out the appeals process.

During 2009 NIEA will continue to investigate non-compliance with the regulations and the range of available enforcement options will be used as appropriate.

6.0 FUNDING AND RESOURCES

6.1 Income

The NIEA compliance monitoring activities discussed in this document are funded from annual registration fees paid by producers direct or via their compliance scheme. Accredited reprocessors and exporters also pay an annual application fee. These fees provided NIEA with an income of £370,000 in 2009/10.

6.2 Funded Activity

The fee income generated is used to fund a team of 2 senior compliance officers and 4 compliance officers. The compliance officers are each assigned a geographical region of Northern Ireland which is the focus of their compliance monitoring activities. Each compliance officer has approximately 100 registered businesses to monitor on a 3-year rolling programme and several hundred non-obligated businesses to keep under review. One of the senior compliance officers is the main point of contact for Compliance Schemes and their auditing. The other senior compliance officer focuses on monitoring accredited reprocessors and exporters and is also responsible for business development in this area. The fee income also funds team management and administration support. Team management is responsible for development of policy and guidance and works in close partnership with the other regulatory bodies the Environment Agency and the Scottish Environment Protection Agency. There is also regular liaison with regulatory bodies in the Republic of Ireland – the Environment Protection Agency and Repak. NIEA is a member of the Advisory Committee on Packaging and the NPWD Advisory Group.

It is noted that in addition to the compliance monitoring outlined in this report, the fee income also has to cover activities such as: administration of the registration of schemes and direct registrants; administration of reprocessors and exporters accreditation; data management and reporting; the provision of advice and guidance and general awareness raising activities; enforcement activities.

6.3 PRN and PERN Costs and Revenues

The cost of PRNs and PERNs is not controlled in any way by the NIEA or the other regulators. Any charges levied by accredited reprocessors or exporters for the procurement of PRNs and PERNs are controlled by market forces. It is important to note that NIEA does not receive any revenue, either directly or indirectly from any charges made for PRNs and PERNs.

Revenue raised through PRNs and PERNs is retained by accredited reprocessors and exporters. They are required to provide information to NIEA in their annual application, in the format of a three year business plan, on how the revenue will be used to fulfil one of three objectives: increased collection of UK packaging waste, increased capacity for reprocessing and expansion of end markets for reprocessed waste materials.