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To whom it may concern,

Having reviewed the proposed European Union (Packaging) (Amendment) Regulations 2022 I wish to make the following submission.

The stated aim of the regulations is to remove the self-compliance option from the Packaging Regulations. It appears to me, that the proposed regulations fail to achieve that objective.

Regulation 10 and 11, which requires that major producers take back packaging and sets out the targets for the amount of packaging, importers and packer/fillers have to recycle/recover, still apply.

Regulations 12-15 are revoked which means that the major producer doesn't have to register with the local authority, there is no prohibition on purchasing packaging from another major producer to comply with the targets and no implementation plans, and no fees.

There are no self-complier registers with the local authorities and no requirement for the LA to advertise the self-compliers.

Regulation 17 provides the option for a self-complier to avoid the requirements of Regulation 10 and 11 to join the Approved Body, but does not make it compulsory.

Regards



An timpeallacht? Smaoinigh air sula bpriontáileann tú an r-phost seo.

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