

## AVA LOBBYING UPDATE



This is the first of a series of regular newsletters to keep you informed and up-to-date with the legislative and regulatory changes which are likely to have an impact on our industry. The AVA undertakes a wide range of lobbying and influencing activity with the assistance of its Committees. There are three voluntary Committees Environment, Technical and Commodities. Made up of experts within the industry, who share their expertise in a non-competitive environment for the benefit of all AVA members.

They track legislative and practical developments in the vending market and associated industries providing early warning of proposed Government action which will impact vending and with the aim of promoting best practice amongst members. They also collect the data, information and background that allows the AVA to be seen as a reliable and knowledgeable partner in discussion with Government bodies, Ministries or related official organisations.

Here are some current examples of lobbying activities in which the AVA and the Committee members are involved on your behalf.

### Plastics and Recycling

The debate about the circular economy, plastics and recycling has moved a long way in a short time. It touches all our daily lives, politics, media, and business. Starting with paper hot cups as public enemy No: 1, the agenda has become very much a plastics led campaign, seeking to moderate society's throw-away culture. The impacts will be with us for the long term. What we mustn't forget is that the political agenda is the key driver.



### HM Treasury

- HM Treasury: Single Use Plastics Tax: UK Plastic Packaging Tax will apply to all plastic packaging that contains less than 30% recycled content.
- The intention is to create and support a market for recycled plastic, to encourage development of new material including recyclate and, of course, to increase tax revenue
- The AVA Environment team have already had several successful meetings with HM Treasury officials and Civil Servants. We will learn of HM Treasury intentions for the Plastics Tax in the autumn Budget, and a technical consultation to follow. The AVA will respond – and let you know how you can too. Every voice must be heard.



- The reform of the Packaging Waste Regulations means that, whereas currently businesses only need to register if they handle over 50 tonnes of packaging waste and have a turnover of more than £2m; now **every business** that handles packaging waste will potentially have to register, record and pay to have their packaging waste recycled.
- **Extended Producer Responsibility (EPR)** will bring reform of the Packaging Recycling Notes (PRN) system. At present manufacturers, importers and suppliers only pay for some 10% of the cost of recycling packaging waste. However, in the future this will be 100% - or possibly even more!
- **Deposit Return Scheme proposals for England, Wales, N.I.** – these reflect closely the shape of the proposal for Scotland (see below). The AVA has, along with a number of other interested organisations, made a submission as part of the consultation process.
- **Consistency in Household & Business Collections** is to make sure recycling targets are achieved and remove consumer confusion. It will introduce separate Food Waste collection.
- For each of these topics there will be further technical consultations through Defra in the autumn and early next year, we will respond and provide AVA members with detail of how they can respond too.



- Deposit Return Scheme (DRS) for Scotland – This is primarily intended to deter littering by encouraging the return of a range of beverage containers with a charge raised and reimbursed at the point of sale. The proposal for the Scottish scheme includes PET bottles up to 3ltrs, steel and aluminium cans and glass bottles. Every retail outlet which sells any of these will be obligated to have a return and consumer reimbursement system in place. It is likely that up to 3,500 Reverse Vending machines will be required as just one part of this scheme.
- The Scottish Expert Panel on Environmental Charging & Other Measures (EPECOM) has recommended a point of purchase 20p-25p Levy on every single-use disposable beverage cup. This would apply initially to those cups made from cardboard lined with plastic, which would currently include vending cups. With the average retail price of a vended cup of coffee at 27p and almost 40% of hot beverages ‘free vend’, this would have an inequitable impact on vending compared to high street coffee chains. The AVA is currently lobbying and seeking meetings with the officials concerned to present our case for exemptions.



And there are moves to introduce the same 25p levy in Wales too.

**Commodities Committee action:**

- Nutritional Guidelines (Scotland’s Population Health Directorate: Healthcare Retail Standards / Healthy Living Awards



The AVA arranged a meeting with Government representatives who had declared their intent to drive the extension of nutritional profiles in to all areas within NHS Scotland. This was attended by a representative selection of our Operator membership. To ensure that, at the very least the Authority

is aware of the practical and economic impact of their proposed actions. Not just on the Operators, but also the Boards who control and benefit from vending on sites. Our concern – as always – is that vending is seen as a soft target and ‘easy win’ in restricting retail. The aim is that whatever guidelines there are – are implemented across all retail outlets equally. Next steps will be agreed at another meeting in September.



Department  
of Health &  
Social Care

- Banning of Energy Drinks in Vending machines. The aim of DHSC is to restrict sale of energy drinks to under 16’s. To achieve this, they propose a sales ban in vending: The DHSC consultation says: “If children are to be prevented from buying energy drinks from vending machines, how should this be done?”

- All sales of energy drinks from all vending machines should be prohibited, regardless of the age of the person buying them.
- Sales of energy drinks from vending machines should be subject to age restrictions, to be enforced by the businesses or organisation on whose property the vending machine is located
- All sales of energy drinks from vending machines should be prohibited in specific locations with high child footfall, for example educational establishments, sports centres and youth centres”



We see this a setting a dangerous precedent – singling out vending for special, restrictive treatment The AVA said as much in our submission to the DHSC consultation plus in follow up discussions with DHSC personnel and we are now awaiting feedback.

The Scottish Government is also currently formulating a strategy to address the same issue. The AVA has been contacted and is in touch with the relevant Civil Servants as part of this process.

So, all in all, a lot of activity is taking place on your behalf. If you feel you wish to be part of the Committee teams, let us know.

In the meantime – keep an eye out for our updates and bulletins – and be prepared to act!

