BESPOKE
ENVIRONMENTAL
SUPPORT

Environmental update

Herefordshire
Health & Safety Group

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Overview

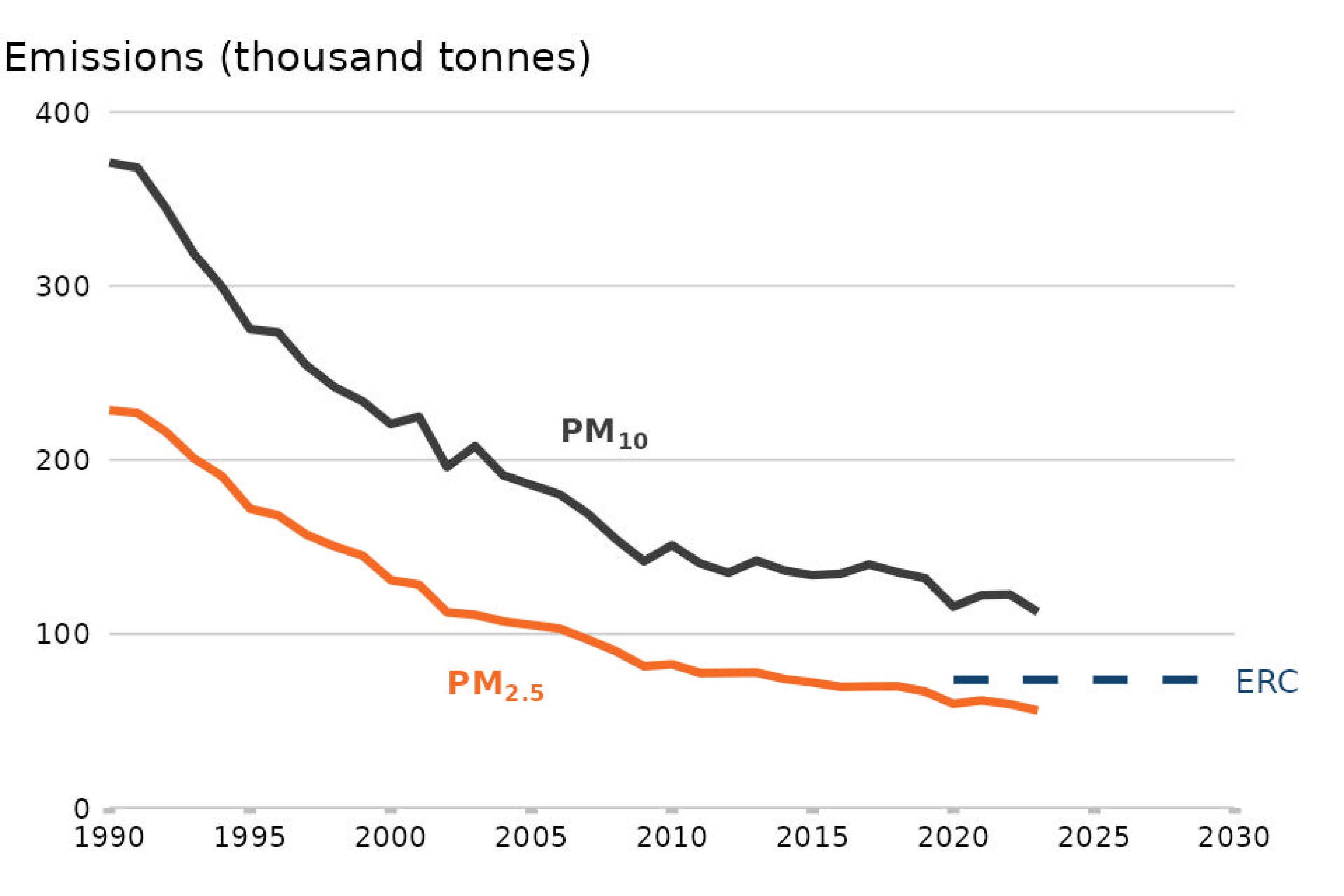
- Environment Act 2021
- Plastic & packaging
- Energy
- Water
- UK BAT
- ISO14001:2026
- Waste

Environment Act 2021

Environment Act 2021

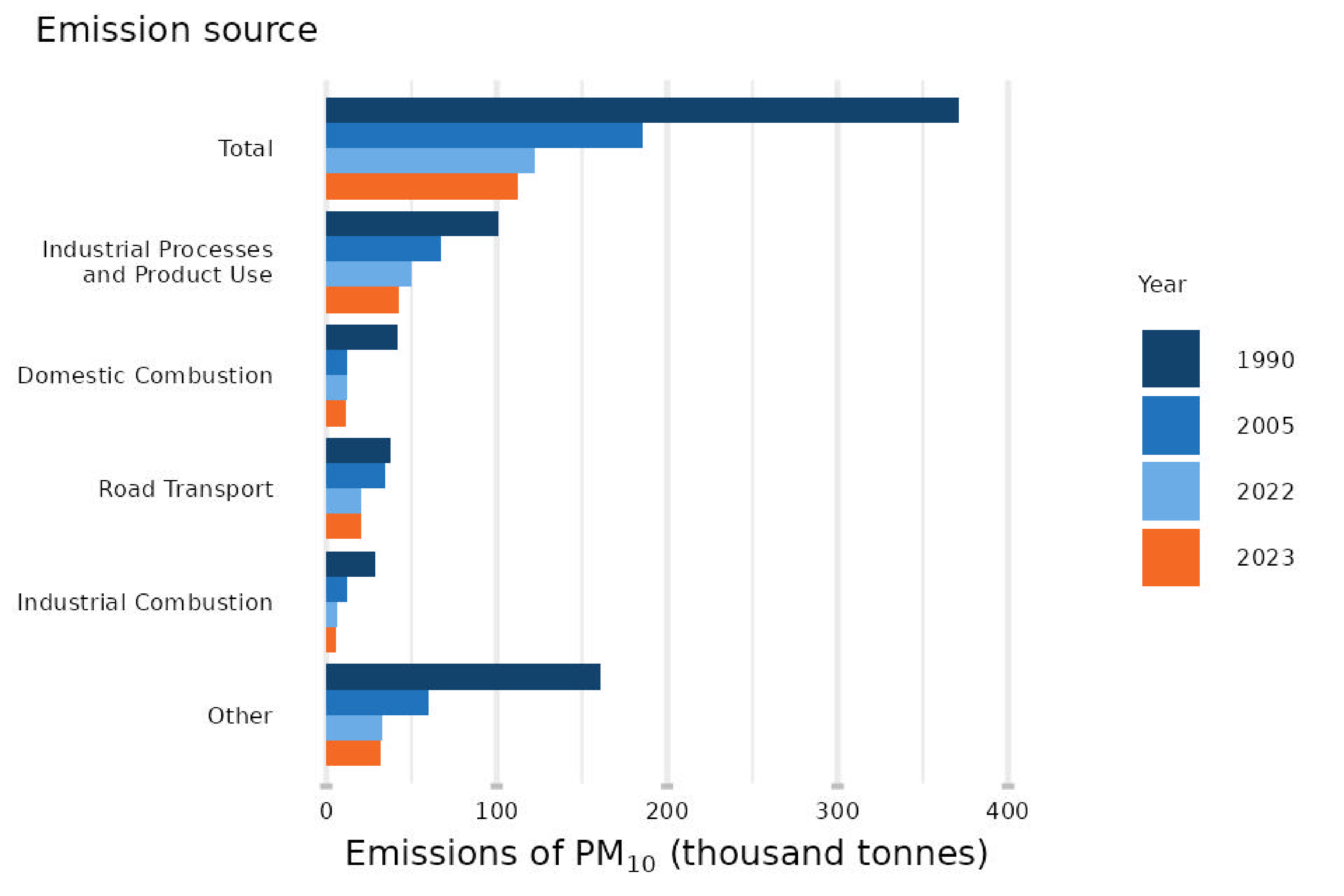
- Sets the themes that environment policy will be following
- Air quality improvements – PM10
- Waste & resource efficiency
- Better water quality
- Improved management of water resources
- Increased biodiversity and nature gain

Environment Act 2021



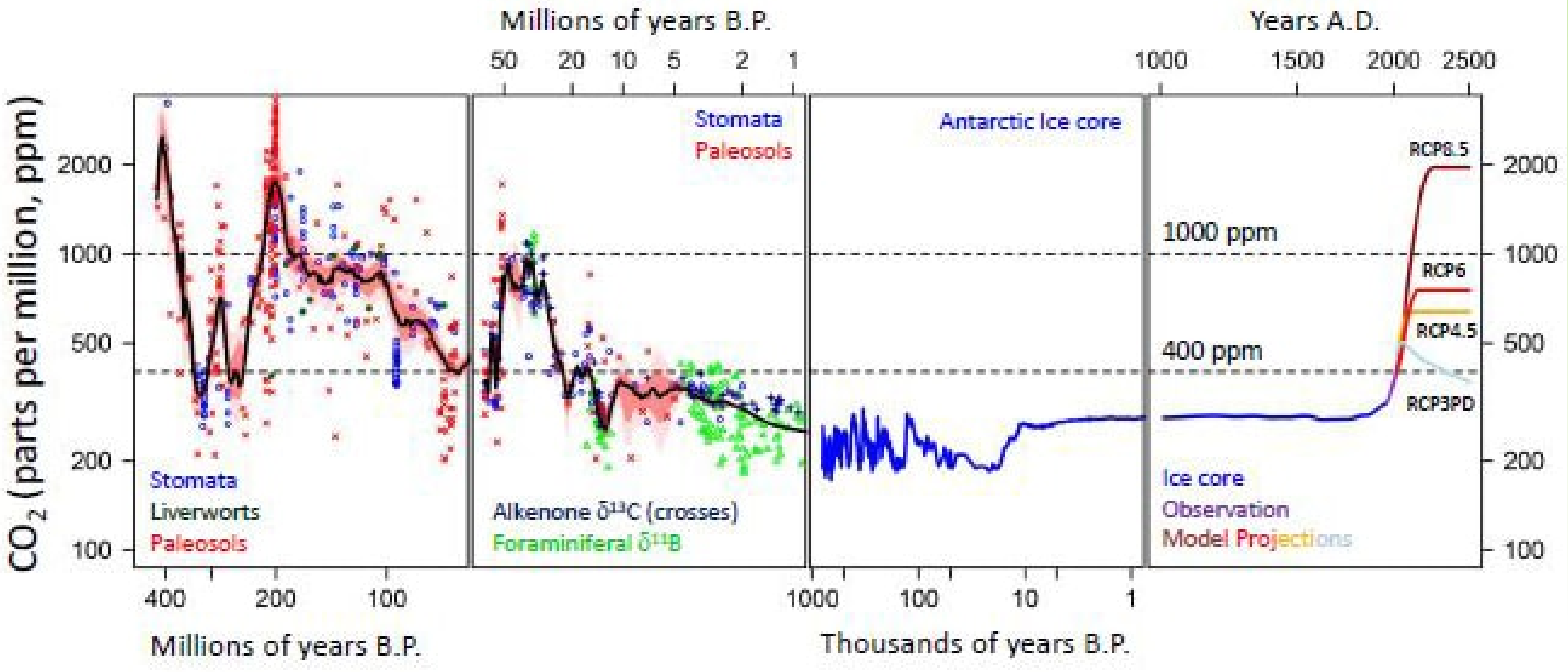
Source: gov.uk

Environment Act 2021



Source: gov.uk

Atmospheric carbon trend



Source: earth.org

Plastic and packaging

Plastic and packaging

Extended Producer Responsibility	Plastic Packaging Tax
Consistent collections	Deposit Return Scheme

Plastic and packaging

EPR

- Since 2024
- PRNs continue to partly fund packaging recovery
- ‘EPR fees” to cover the rest
- To be charged to brand owners of household packaging

Plastic and packaging

- Large producers
  £2M turnover & 50T handled
- Small producers
  £1M turnover & 25T handled

Plastic and packaging

PRNs – Packaging evidence requirements

Packaging recycling targets 2025 to 2027

Material or process	2025 business target	2026 business target	2027 business target
Paper	75%	77%	79%
Glass	74%	76%	78%
Aluminium	61%	62%	63%
Steel	80%	81%	82%
Plastic	55%	57%	59%
Wood	45%	46%	47%

Plastic and packaging

EPR

- Modulated EPR fees from 2026 based on a Recycling Assessment Methodology
- All household packaging placed on the UK market from H1 2025 must be assessed using a RAM

Plastic and packaging

Material	EPR Base Fee (per tonne placed on UK market)
Aluminium	£266
Fibre-based composites	£461
Glass	£192
Paper and cardboard	£196
Plastic	£423
Steel	£259
Wood	£280
Other	£259

- Collecting, sorting and disposal of HH packaging by councils
- EA costs
- Scheme Admin costs
- Recycling ad campaigns

Plastic and packaging

EPR

- RAM reporting due for H2 2025 for HH packaging
- Large Producers of HH packaging affected
- Considers ease of collection, sorting, reprocessing and quality of recycled final product
- Material will get a RAG rating

Plastic and packaging

Rating	
Red	Hard to recycle at scale due to contaminants, materials or substances making them hard to collect, sort or process **Highest fee penalties (Y1 20%, Y2 60%, Y3 100%)**
Amber	Recyclable with specialist infrastructure **Some fee penalties**
Green	Widely recyclable within existing UK recycling infrastructure **Potential discounts to EPR fee**

Plastic and packaging

EPR

- Nation of Sale reporting required annually
- Declare which UK nation you are selling your packaging into
- Must collect data for 2024, 2025 but don't need to report yet

Plastic and packaging

Plastic Packaging Tax

- 2025 rate £223.69/T
- From Apr 2027:
  - New mass balance approach for chemically recycled plastics
  - Pre-consumer waste excluded from recycling calculation

Plastic and packaging

Deposit Return Scheme

- England, Scotland and NI scheme launching in October 2027
- Applies to drinks businesses
- PET, Alu and steel drinks containers 150ml – 3 litres
- Deposit charge must be charged by the seller to their buyer in the supply chain
- Retailers >100m^2 must host a return point

Plastic and packaging

Consistent Collections

- First stage introduced in March 2025
- Householders and SMEs < 10 FTE in-scope from March 2026
- Plastic films from March 2027

Plastic and packaging

- Plastic
- Glass
- Paper and Cardboard
- Metal
- Food waste
- Garden waste (Local authorities only)

- Enforcement charges to be introduced by EA (£118/h)

Energy

Energy

- UK ETS and CBAM
- Domestic rentals energy efficiency standards
- Climate Change Agreements extended to 2030
- Nuclear Regulated Asset Base

UK ETS and CBAM

- Obligated sectors required to obtain a GHG permit

- Aviation sector
- Oil refining
- Iron and steel
- Aluminium
- Other non-ferrous metals
- Cement
- Glass & ceramics
- Paper industry
- Chemical production

- Carbon capture & storage
- Plasterboard manufacture
- Domestic Maritime sector (from July 2026
- Waste to Energy (from 2028)
- Carbon removals (after 2029)

Where >20MW thermal energy combusted

UK ETS and CBAM

- Obligated companies must surrender “carbon allowances” equal to their previous year’s emissions
- UK ETS carbon price currently around £42/T

Total emission − Any free or banked allowances = Number of allowances to surrender

UK ETS and CBAM

- Obligated companies must surrender “carbon allowances” equal to their previous year’s emissions
- UK ETS carbon price currently around £42/T
- Total number of allowances are capped, and reduced over time to bring down overall emissions
- Companies reducing their emissions can sell their allowances to other companies that have a shortfall
- EU ETS has achieved a 48% in emissions since 2005; 62% target by 2030

UK ETS and CBAM

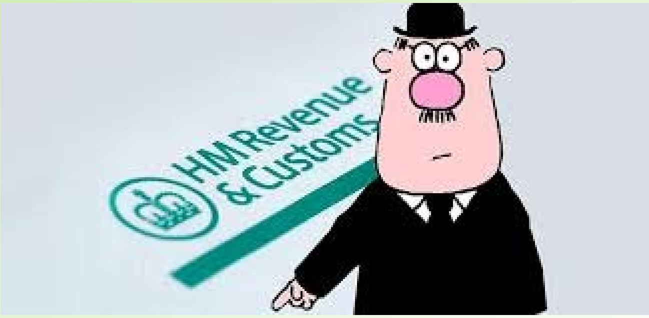
- Carbon Border Adjustment Mechanism to protect UK manufacturers from imported products made with no carbon costs
- Aluminium
- Cement
- Fertilisers
- Hydrogen
- Iron and steel

Implemented from 2027

UK ETS and CBAM

Steel product containing 100 tonnes of embedded carbon

£4,200



Carbon border

UK manufacturer would have paid £4,200 for carbon allowances

UK ETS and CBAM

- Imported products may become more expensive
- Important to understand carbon intensity of affected products
- Long term potential hit to UK for trade with EU countries; EU CBAM starts 2026

UK ETS and CBAM

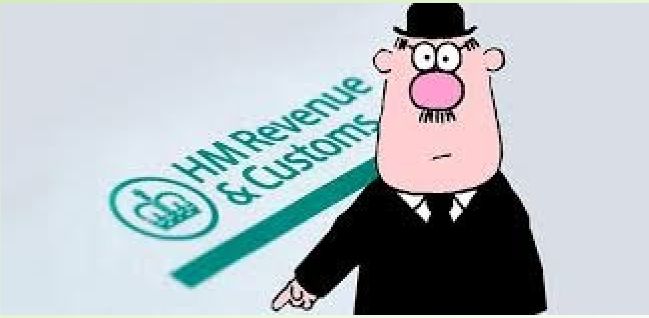
Steel product containing 100 tonnes of embedded carbon

EU manufacturer would have paid £6,730 for carbon allowances

Carbon border

UK manufacturer would have paid £4,200 for carbon allowances

£0



UK ETS and CBAM

Carbon border

UK manufacturer would have paid £4,200 for carbon allowances

EU manufacturer would have paid £6,730 for carbon allowances

Steel product containing 100 tonnes of embedded carbon

£2,530

UK ETS and CBAM

- Imported products may become more expensive
- Important to understand carbon intensity of affected products
- Long term hit to UK for trade with EU countries; EU CBAM starts 2026
- Potential for some countries to “dump” product onto the UK during 2026
- Government currently negotiating to align with the EU ETS and CBAM systems to prevent friction to trade.

Domestic rentals energy efficiency

- The Domestic Minimum Energy Efficiency Standard (MEES) Regulations
- Since 2018 all landlords have had to achieve a minimum energy efficiency rating of E, unless exempt etc., up to a cost cap of £3,500
- Recent consultation to increase to C by 2030, with a £15,000 cost cap, for all new tenancies
- Will affect around 2.5 million homes.

Climate Change Agreements

- Voluntary agreements made between UK industry and the Environment Agency to reduce energy use and CO_2 emissions
- 35 companies in Herefordshire currently within agreements
- Offers discounts on Climate Change Levy part of energy costs
- Scheme due to end in March 2025
- Scheme has been extended to 2030 – participants need to re-register their eligibility
- 2025 window for new registrants closed 31 August. 2026 window opens in Jan.

Nuclear Regulated Asset Base (RAB)

- New funding system whereby nuclear developers obtain a licence to charge the cost of building their nuclear projects direct to energy bills
- Sizewell C project to apply a £3.46/MWh charge to bills from 1 November 2025 (£3.93 from Jan 26)

Water

Water

- All UK waterways failing WFD standards
- Storm overflow reporting
- Upcoming regulatory change with likely abolition or restructuring of OFWAT, EA water regulation and Drinking Water Inspectorate
- Long-standing intention to move abstraction licensing into environmental permitting
- Nutrient neutrality planning rules continue where protected sites are impacted by excess nutrients
  - Wye & Lugg catchments

UK BAT

UK BAT

- Best Available Techniques
- The environmental and efficiency standards that permitted industries must achieve
- Derived from European BAT Conclusions
- UK BAT has been under development for several years, taking a phased approach across all regulated sectors

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- Best Available Techniques
- The environmental and efficiency standards that permitted industries must achieve
- Derived from European BAT Conclusions
- UK BAT has been under development for several years, taking a phased approach across all regulated sectors
- Applicable to all UK nations

UK BAT

- Ferrous Metals Processing Industry (Forming & Galvanising)
- Textiles industry
- Chemical industry waste gas treatment

Final drafts published – expected end of 2025

In development

- Ceramic manufacturing
- Large volume inorganic chemicals
- Slaughterhouses & animal byproducts
- Foundries
- Surface treatment of metals and plastics

ISO14001:2026

New ISO14001:2026

- FDIS published
- Recognise climate change risks and opportunities
- Changes to Context of the Organisation and stakeholder analysis requirements
- Incorporates biodiversity and climate to environmental policies and more focus on leadership commitment
- New clause better defining Management of Change requirements

Waste

Waste

- New exemption charges
- Carrier, broker and dealer reform
- Digital waste tracking
- Batteries and POPs

Waste: New exemption charges

- New EA fees for waste activities that don't need an environmental permit
- Fixed £56 fee each time you register an exemption or exemptions on the EA website

Band	Full charge	Discounted charge
Upper	£1,236	£227
1	£420	£76
2	£212	£76
3	£30	£30
Farming exemptions	Capped at £88 for unlimited relevant exemptions	

Waste: Carrier, broker and dealer reform

- Policy paper published August 2025
- Replacing waste carrier, broker and dealer registration system
- New permits required for waste **controllers** and waste **transporters**
- Different charges and in-house competency requirements for higher and lower risk wastes (4 tiers)
- Current lower-tier waste carriers will be able to register an **exemption**
- Impact on all waste holders' Duty of Care obligations

Waste: Carrier, broker and dealer reform

- **Waste controllers**

Any business:

  - organising waste collection, its transportation or end destination
  - making arrangements for its assessment and ensuring it has been classified
  - arrange the recovery or disposal of waste on behalf of others
  - buying or selling waste.

- Examples include brokers, dealers, consultants & waste sites
- Also businesses collecting waste they remove from customers' premises during their activities, e.g. plumbers or gardeners

Waste: Carrier, broker and dealer reform

- **Waste transporters**

Any business instructed by a controller to move waste between locations without input on the end destination or waste classification

- Examples include hauliers, contractors or delivery drivers

Waste: Carrier, broker and dealer reform

- **Types of permit**

Waste controller only

Waste transporter only

Waste controller-transporters

- Four risk tiers with increasing charges and standard conditions
- Permits will need renewal every three years

Waste: Carrier, broker and dealer reform

- **Exemptions**

Requires registration (maybe a fee)	No registration
Mines and quarries waste	Waste producers*
Charities	Local authorities
Transporting own agricultural waste	
Animal by-products	
Transporting own non-C&D waste in the course of your own business	

Waste producers will be exempt so long as they pass waste to a permitted waste site, waste controller-transporter or use a waste broker (controller)

Waste: Digital waste tracking

- 1.15 million incidents of flytipping reported in FY 2023/4 (+6%)
- 60% involve household waste
- 63,000 FPNs
- 1,541 successful prosecutions
- Average fine £530
- Cost to LAs of clearing “large flytipping” £13.1 million

- 34MT (18%) of waste managed illegally in 2023
- £1 billion cost in lost tax, environmental and social harm and damage to legitimate business

Waste: Digital waste tracking

- Plan to introduce from April 2026
- Currently 12,000 waste sites, 150,000 exemption holders and 300,000 registered carriers, brokers and dealer

- DWT to start with sites with permits that receive waste inputting all waste received to the system from October 2026
- Expansion to other users from April 2027
- Working to align with EU waste import/export IT system DIWASS
- Intended ultimately to result in the replacement of the paper consignment and waste transfer note system

Waste: Batteries & POPs

- Battery waste management industry recycling capabilities expanding
- Up to 78 million Li-batteries being discarded worldwide every day
- Battery waste (mainly lithium) fires up 71% in 2024
- Estimated cost of fires to UK economy £158 million
- New ADR 2025 regulations covering storage of batteries for transport
- Ensure segregation from other waste streams

Waste: Batteries & POPs

- POPs – Persistent Organic Pollutants
  Dioxins & furans, PCBs, pesticides, PFAS, PFOS/PFOA, SCCPs, brominated flame retardants
- Upholstered furniture, electronic waste, cables, firefighting foams, old transformers
- Legal requirement to destroy POPs waste, it must not be reused or recycled
- Must be either chemically destroyed or incinerated
- Some second-hand sales permitted if re-use is guaranteed with no more than minor repair

Useful links

- Plastic Packaging Tax
- EPR for packaging
- Waste exemption charging
- Carrier, broker and dealer reform
- Classifying different kinds of waste (including POPs and WEEE)

BESPOKE ENVIRONMENTAL SUPPORT

- Environmental permitting
- Technical support resource
- Air emissions modelling
- Waste audits and advice
- General compliance support
- Bespoke environmental training packages
- Management system implementation
- ADR Dangerous Goods advice
- Tender management support

Any Questions?