



Public Consultation Submissions & Responses

Amendments to the Packaging and Packaging Waste Regulations to reflect the regional collection of waste

November 2022

Environment & Resources Authority

A decorative graphic in the bottom right corner consisting of several parallel, diagonal green lines of varying shades, creating a sense of movement and depth.

CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	<p>Maria C. Borg</p> <p>Malta Sociological Association</p> <p>16/11/2022</p>	<p>With reference to the consultation in question (link to consultation), the Malta Sociological Association (registered VO 1323) proposes that the policy process which comprises the national strategy employs social impact assessments in an ongoing process.</p> <p>The International Principles for Social Impact Assessment defines SIA as being “the processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions”.</p> <p>An SIA is an interdisciplinary process, and should employ various methods, both quantitative and qualitative. Social impact assessments should not be one-off exercises: To the contrary, they should be ongoing processes which engage with various stakeholders and which report back so as to ensure effective policy processes.</p> <p>In this regard, you may refer to international SIA standards, for example those set by the International Association for Impact Assessment, which is accessible from this link:</p> <p>https://www.socialimpactassessment.com/documents/IAIA%202015%20Social%20Impact%20Assessment%20guidance%20document.pdf</p> <p>Reference: Frank Vanclay (2003) International Principles For Social Impact Assessment, Impact Assessment and Project Appraisal, 21:1, 5-a12, DOI: 10.3152/147154603781766491</p>	<p>Whilst suggestion has been noted, the carrying out of a social impact assessment for the entry into force of this LN was not deemed necessary or beneficial, taking into account the necessity of these amendments emanating from the amended Local Government Act as further explained in the comment below. In addition, such amendments are also in line with the spirit of Malta’s new Waste Management Plan, which was subject to extensive public and primary stakeholder consultations.</p>

2	<p>Stefan De Marco</p> <p>The Malta Chamber</p> <p>17/11/2022</p>	<p>Overview</p> <p>The Malta Chamber notes that as of 1st January 2023, the Environment and Resources Authority (ERA) intends to assign responsibility for the collection and recycling of consumer packaging waste to Local Councils (now grouped within 6 regions).</p> <p>Presently this responsibility falls within the implementation remit of PROs (GreenPak and Green MT) which are contracted to directly collect and recycle consumer packaging waste.</p> <p>The general feedback received by The Malta Chamber from its members is that the current system contributed to maintaining costs at acceptable levels for the past 10 years. The Malta Chamber therefore cautions about the possibility that the proposed changes may result in added costs incurred by the Regional Councils, as well as administration fees, which will in turn be transferred on to the PROs which are thereafter charged to the operators.</p> <p>Thus Wasteserv (WS) will be freed from its current obligation to pay the PROs for the value of recyclable materials delivered to this government-owned facility resulting in elevated costs which somehow need to be covered. Both WS and the Regions are state-owned and have the authority to waive the obligation to cover financial transactions between the waste collection parties. Taking all these proposed changes into consideration, the fees that the PROs will incur and will be passed on to trading companies, are likely to increase substantially as of 1st January 2023.</p> <p>The Malta Chamber proposed that government introduces a rebate on material or biodegradable packaging (in a year or less) which would be both environmentally and financially more sustainable.</p> <p>The Malta Chamber questions the added value of the Legal Notice and is unclear on the intended socio-economic benefits and goals.</p>	<p>The Waste Management (Packaging and Packaging Waste) (Amendment) Regulations, 2022 were drafted to bring the legal regime in sync with the amended Local Government Act (Chapter 363 of the Laws of Malta) and following the issue of regional waste collection tenders. In 2019, the Local Government Act was amended, introducing, amongst other changes, the function of the Regional Councils to issue calls for tenders for the service to local councils within them for waste management. Six regional service tenders were published on 19th May 2022 for “Household Waste Collection using Low Emission Vehicles” in order to cater for the door-to-door collection service for household residual waste (the black bag), organic waste (white bag) and recyclables (green/grey bag plus glass).</p> <p>The draft LN takes into consideration the above and attempted to propose the most feasible way forward, keeping in mind the extended producer responsibility obligations imposed on producers through EU legislation. To this end, the draft LN clearly stipulates that “<i>the financial contributions paid by PROs shall not exceed the costs that are necessary to provide waste management services in a cost-efficient way</i>” and that such costs “<i>shall be established in a transparent way between the Authority, the Regional Councils and any other actors concerned</i>”. In this respect, one is also to note that, in line with the spirit of the polluter-pays principle and therefore EPR principle enshrined in EU and national waste legislation, producers of packaging</p>
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		<p>The Malta Chamber is concerned that the proposed changes in the packaging regulations will impinge on the ability of companies to fulfil their extended producer responsibility, an EU requirement nationally incorporated in the Malta 2020-2030 Waste Strategy. It therefore cautions that new proposals should move in parallel with each other to avoid policy fragmentation and operational confusion.</p>	<p>are to cover the whole costs of the management of the waste arising from the packaging they place on the national market.</p>									
		<p>Clarifications Needed and Queries</p>										
		<table border="1"> <thead> <tr> <th data-bbox="499 451 584 488">No</th> <th data-bbox="584 451 902 488">Legal Notice Reference</th> <th data-bbox="902 451 1408 488">The Malta Chamber Feedback</th> </tr> </thead> <tbody> <tr> <td data-bbox="499 488 584 1134">1</td> <td data-bbox="584 488 902 1134"> <p>Pg 2, No 3 (Add new regulation 3A to the principal regulations) 3A. (1) S.L. 549.141. <i>"In line with regulation 4 of the Extended Producer Responsibility Framework Regulations, producers and authorised representatives shall bear the whole costs of the management of the packaging waste arising from the packaging and packaging material they place on the market of Malta."</i></p> </td> <td data-bbox="902 488 1408 1134"> <p>Referring later to Pg 11, No 17 (Amends Schedule 8 to the principal regulations) (b): <i>"The words "Part A: Fee for a producer of packaging or packaging material", thereof shall be deleted"</i> and (c): <i>"Part B thereof shall be deleted"</i> These two references are not clear how the costs for packaging producer material will be paid.</p> </td> </tr> <tr> <td data-bbox="499 1134 584 1385">2</td> <td data-bbox="584 1134 902 1385"> <p>Pg 8, No. 10 (Amends regulation 17 of the principal regulations)</p> </td> <td data-bbox="902 1134 1408 1385"> <p>Amended regulation 17 states the annual declaration for packaging material shall be audited by an independent auditor. The amendment lacks clarity in the context of the current S.L.549.43</p> </td> </tr> </tbody> </table>	No	Legal Notice Reference	The Malta Chamber Feedback	1	<p>Pg 2, No 3 (Add new regulation 3A to the principal regulations) 3A. (1) S.L. 549.141. <i>"In line with regulation 4 of the Extended Producer Responsibility Framework Regulations, producers and authorised representatives shall bear the whole costs of the management of the packaging waste arising from the packaging and packaging material they place on the market of Malta."</i></p>	<p>Referring later to Pg 11, No 17 (Amends Schedule 8 to the principal regulations) (b): <i>"The words "Part A: Fee for a producer of packaging or packaging material", thereof shall be deleted"</i> and (c): <i>"Part B thereof shall be deleted"</i> These two references are not clear how the costs for packaging producer material will be paid.</p>	2	<p>Pg 8, No. 10 (Amends regulation 17 of the principal regulations)</p>	<p>Amended regulation 17 states the annual declaration for packaging material shall be audited by an independent auditor. The amendment lacks clarity in the context of the current S.L.549.43</p>	<p>A new regulation 3A was added in order to incorporate the new general minimum requirements on EPR established in the EPR Framework Regulations (S.L. 549.141) within the Packaging and Packaging Waste Regulations (S.L. 549.43).</p> <p>As regards the amendment to Schedule 8, this seeks to remove the additional fee for self-compliant producers which has been replaced by the administrative penalty in Schedule 17.</p> <p>The draft amendment in question refers to an annual declaration on placing on the market by the members of the PROs, which serves the purpose of establishing the PROs' market share, as opposed to the provisions set out in regulation 22(7), which apply to auditing of the operations of self-compliant producers (not PROs members for transport</p>
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2	<p>Pg 8, No. 10 (Amends regulation 17 of the principal regulations)</p>	<p>Amended regulation 17 states the annual declaration for packaging material shall be audited by an independent auditor. The amendment lacks clarity in the context of the current S.L.549.43</p>										

			regulation 22 (7) which states: <i>“if a self-compliant producer is exempt from such provision provided that: The said producer provides evidence of participating in a certified environmental management system(s) in accordance with international or European Union standards.”</i>	packaging). Hence, the different obligations. On a separate note, an amendment to regulation 17(1) was carried out following public consultation, so as to reflect the new methodology for the establishment of the PROs’ market share.
		3	<p>Regional Councils and PROs</p> <p>The Malta Chamber requires more clarity on:</p> <ol style="list-style-type: none"> 1. The relationship and responsibility demarcation between Regional Councils and PROs. 2. If the PROs are going to lose a significant amount of autonomy, why are regional council penalties (outlined on page 14 of the amendments where the regional council would be liable to pay €100 per tonne and the PRO or self-compliant producer would be liable to pay €320 per tonne) significantly lower than PROs? Penalties and any fiscal incentives should mirror the responsibility and ability of action of each separate entity. 3. On page 13 administrative penalties for not reaching targets are listed. The Malta Chamber believes that in order to truly achieve a proper circular approach, regional councils need incentives to not 	<p>The PROs will retain financial responsibility for the management of the municipal packaging waste, in line with the Packaging Waste Directive and EPR responsibilities, whilst the Regional Council will have organisational responsibilities, including responsibilities to attain the targets. The only exception being the recycling points (previously known as bring-in-sites), for which the PROs retain overall management. In view of the proposed system, the municipal packaging waste collected from recycling points that is recycled will count towards the attainment of the targets by the Regional Councils.</p> <p>The comment regarding the administrative penalty has been noted and an amendment was carried out so as to make the same calculation process applicable for Regional Councils and PROs placing transport packaging and refillable gas cylinders on the market in Schedule 17.</p> <p>Whilst comment is being noted, enforcement of obligations is also important.</p>

			simply meet the very basic requirements but ideally exceed the targets.	
		4	<p>Pg 4, No. 6 (Amends regulation 13 of the principal regulations) – pg 6 No (5)</p> <p>The Malta Chamber notes that the cylinders of most gases can be emptied and recycled as scrap metal, however, scrap acetylene cylinders (EWC 15 01 11*) are considered as hazardous waste in the same way as fire extinguishers which are excluded from this legislation (EWC 15 01 10*). Such acetylene cylinders require complex processes to be recycled, which if carried out by untrained personnel may lead to severe health issues or environmental issues due to the possibility of such cylinders having asbestos and flammable solvents.</p> <p>In the LN amendments, the definition of refillable gas cylinders is refillable cylinders used for various kinds of gas but excludes fire extinguishers.</p> <p>Due to risks and hazards related to the recycling of acetylene cylinders, the complex procedures to recycle such cylinders and the fact that another type of cylinder, which is considered as an absolute hazardous waste is already excluded, The Malta Chamber suggests excluding acetylene cylinders (EWC 15 01 11*) from the purpose of this legislation.</p>	<p>The proposed definition for refillable gas cylinders solely aims at allowing producers placing such cylinders on the market to self-comply, on the condition that they demonstrate to the satisfaction of the Authority that systems for the environmentally sound reuse of used gas cylinders and the environmentally sound management (ESM) of waste gas cylinders are in place. To also note that self-compliant producers are to submit a three-year implementation plan specifying the steps to be taken in order to comply with the requirements of S.L. 549.43, including on packaging waste prevention and minimisation, as well as on the ESM of the packaging waste generated in line with the Waste Regulations, S.L. 549.63. In this regard, any such hazardous waste can only be treated at facilities duly authorised to accept such waste.</p>

		Recommendation number	Regulation in current legislation	(Packaging and Packaging Waste (Amendment) Regulations 2022)	Authorised Packaging Waste Recovery Organisation's Recommendation	
3	Annrica Zammit GreenPak Coop Society Ltd 17/11/2022	1		Sub-Regulation 2 of Regulation 3A: The financial contributions which shall be paid by producers of packaging and packaging material and authorised representatives participating in an authorised packaging waste recovery organisation to comply with their extended producer responsibility obligations shall be modulated, as far as possible, by taking into account the durability, repairability, re-usability and recyclability of the packaging and the presence of hazardous substances in the packaging: Provided that producers participating in an authorised packaging waste recovery organisation who place reusable packaging on the market in Malta that is being reused in a system as referred to in sub-regulation (1) of regulation	Self-compliant producers are to be factored in each time financial contributions are to be made for obligations in relation to packaging and packaging waste.	This specific provision relates specifically to the modulation of the fees charged by Producer Responsibility Organizations (PROs) to their members, and as such it is not applicable to self-compliant producers.

				10A shall be charged such financial contribution only upon the first placing on the market of such reusable packaging: Provided further that such producers demonstrate, to the satisfaction of the Authority, that a system to reuse packaging in an environmentally sound manner is in place. Producers shall furnish authorised packaging waste recovery organisations with data on reuse of reusable packaging according to the formats established by the Authority.		
		2	S.L 549.43. Sub-Regulation 7 of Regulation 13: An authorised packaging waste recovery organisation shall finance any systems set up for the collection, treatment, recovery and	Sub-Regulation 2(b) of Regulation 13: timely collection of such packaging waste and its transport to the authorised waste management establishments or undertakings selected by the respective Regional Council.	When referring to municipal waste, this shall be substituted with 'municipal packaging waste' The statement shall be substituted by the following statement:	Comment noted and proposal has been addressed

		<p>environmentally sound disposal of municipal packaging waste generated: Provided that an authorised packaging waste recovery organisation shall make the necessary arrangements with Local Councils for: (a) the door-to-door collection of municipal packaging waste generated; and (b) the provision of recycling points for the separate collection, by categories, of municipal</p>		<p>timely collection of such municipal packaging waste and its transport to the authorised waste management establishments or undertakings selected by the respective Regional Council.</p>	
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			<p>packaging waste generated according to the quota stipulated in regulation 10(2) of the Waste Regulations.</p> <p>For the purposes of recycling points under this provision, separate collection shall not include co-mingled collection in accordance with the definition of co-mingled collection in regulation 4 of the Waste Regulations</p>			
		3		<p>Sub-Regulation 4(b) of Regulation 3A: the costs charged to authorised packaging waste recovery organisations per tonne of municipal packaging</p>	<p>The statement shall be substituted by the following statement:</p>	<p>This provision is already included in the proviso to regulation 13(9), which is also cross-referenced in sub-regulation 4(b) of regulation 3A, therefore does not require repetition therein and would be out of place given the context of sub-regulation (4).</p>

				waste collected and treated in line with sub-regulations (8) and (9) of regulation 13; and	the costs charged to authorised packaging waste recovery organisations per tonne of municipal packaging waste collected and treated in line with sub-regulations (8) and (9) of regulation 13. Such costs shall be established in a transparent way between the Authority, the Regional Councils, the authorised packaging waste recovery organisations, and any other actors concerned.	
		4		Sub-Regulation 2 of Regulation 8: Self-compliant producers or authorised packaging waste	Consumer packaging shall not fall under self-complaint	For the sake of clarification, producers may opt to self-comply for transport packaging and refillable gas cylinders only (provided that certain conditions are met), thus not for sales or secondary packaging.

				recovery organisations acting on behalf of producers shall take the necessary measures to attain the targets laid down in Schedule 3 with respect to the packaging waste arising from the transport packaging and, or refillable gas cylinders placed on the market in Malta.”	producers and thus the statement shall be substituted by the following statement: Authorised packaging waste recovery organisations acting on behalf of producers shall take the necessary measures to attain the targets laid down in Schedule 3 with respect to the packaging waste arising from the transport packaging and, or refillable gas cylinders placed on the market in Malta.”	
		5		Sub-Regulation 2 of Regulation 8 Sub-Regulation 19 of Regulation 8	For the sake of clarity ‘and,or’ shall be substituted with ‘and/or’	Comment noted and proposal has been included within the amended Legal Notice.

				Sub-Regulation 3 of Regulation 13 Sub-Regulation 3(a) of Regulation 13 Sub-Regulation 5 of Regulation 13 Sub-Regulation a of Regulation 15 Sub-Regulation b of Regulation 15 Sub-Regulation c of Regulation 15 Sub-Regulation d of Regulation 15 Sub-Regulation 3 of Regulation 16 Sub-Regulation a of Schedule 3 Sub-Regulation b of Schedule 3 Sub-Regulation c of Schedule 3 Part B (a) Schedule 10 Part B (b) Schedule 10 Part B (d) Schedule 10 Schedule 12 Schedule 17		
		6	S.L 549.43 - Schedule 11: SCHEDULE OF FEES FOR AN AUTHORISED PACKAGING	Schedule 17: In the case of a Regional Council: - one hundred euro (€100) per tonne if the difference	For fair and equitable treatment, the fees reflected in the administrative	Comment noted and proposal has been addressed.

		<p>WASTE RECOVERY ORGANISATION</p> <p>"C" is a fee equivalent to:</p> <ul style="list-style-type: none"> -one hundred euro (€100) per tonne if "B" is less than 25%; -seventy-five euro (€75) per tonne if "B" is less than 50% but greater than or equal to 25%; and -fifty-five euro (€55) per tonne if "B" is less than 55% but greater than or equal to 50%. 	<p>between "B" and "C" is more than 25 percentage points;</p> <ul style="list-style-type: none"> - seventy-five euro (€75) per tonne if the difference between "B" and "C" is between 10 to 25 percentage points, both inclusive; and - fifty-five euro (€55) per tonne if the difference between "B" and "C" is less than 10 percentage points; <p>In the case of a self-compliant producer or a producer responsibility organisation acting on behalf of producers placing on the market transport packaging and, or refillable gas cylinders:</p> <ul style="list-style-type: none"> - three hundred and twenty euro (€320) per tonne if the difference between "B" and "C" is more than 25 percentage points; - two hundred and fifty euro (€250) per tonne if "B" is less than 50% but greater than or equal to 25%; and - one hundred and eighty euro (€180) per tonne if "B" is less than 55% but greater than or equal to 50%. 	<p>penalty (AP) in Schedule 17 shall be same for regional councils and authorised packaging waste recovery organisations.</p>	
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		8			In Regulation 13, there shall be the inclusion that any administrative fees for the management of municipal packaging waste shall be financed by the Regional Councils	Comment noted.
		9		Sub-Regulation 8 of Regulation 13: An authorised packaging waste recovery organisation shall finance any systems set up by the Regional Councils for the door-to-door collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste generated, according to its annual market share:	Authorised packaging waste recovery organisations, shall be notified of any revision in fees at least six (6) months prior of any revisions coming into force.	Comment noted and an amendment has been addressed.
		10			Authorised packaging waste recovery organisations shall have the right to carry out random spot	Comment has been noted – Such issue requires discussion between the stakeholders which are directly involved.

					checks on authorised waste management establishments or facilities handling and treating municipal packaging waste.	
		11			Regional Councils shall be obliged to provide the authorised waste recovery organisations monthly data within 15 days from the end of the month detailing collection and delivery of municipal packaging waste from local councils.	Comment has been noted – Such issue requires discussion between the stakeholders which are directly involved.
		12	S.L 549.43. Sub-Regulation	Sub-Regulation 2(b) of Regulation 13: timely collection of such packaging waste and its	The statement shall be substituted by	Comment noted and proposal has been addressed.

		<p>7(b) of Regulation 13: the provision of recycling points for the separate collection, by categories, of municipal packaging waste generated according to the quota stipulated in regulation 10(2) of the Waste Regulations. For the purposes of recycling points under this provision, separate collection shall not include co-mingled collection in accordance with the definition of co-mingled</p>	<p>transport to the authorised waste management establishments or undertakings selected by the respective Regional Council</p>	<p>the following statement: timely collection of such packaging waste and its transport to the authorised waste management establishments or undertakings selected by the authorised packaging waste recovery organisations.</p>	
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			collection in regulation 4 of the Waste Regulations:			
		13	S.L 549.43. Sub-Regulation 7(b) of Regulation 13: Provided further that should authorised packaging waste recovery organisations fail to reach an agreement with particular Local Councils, the competent authority, in consultation with the EPR Consultative Committee, shall allocate those Local Councils without arrangements amongst	Sub-Regulation 2(b) of Regulation 13: Provided that should authorised packaging waste recovery organisations fail to reach an agreement with particular Local Councils, the competent authority, in consultation with the EPR Consultative Committee, shall allocate those Local Councils without arrangements amongst authorised packaging waste recovery organisations on the basis of: (a) the latest quarterly declaration submitted by the authorised packaging waste recovery organisation in accordance with regulation 17(1); and (b) the actual demographics of those Local Councils.	The statement shall be substituted by the following statement: Provided that should authorised packaging waste recovery organisations fail to reach an agreement with particular Local Councils, the competent authority, in consultation with the EPR Consultative Committee, shall allocate those Local Councils without arrangements amongst authorised packaging waste	Comment noted and proposal has been addressed.

			<p>authorised packaging waste recovery organisations on the basis of:(a) the latest quarterly declaration submitted by the authorised packaging waste recovery organisation in accordance with regulation 17(1); and(b) the actual demographics of those Local Councils.</p>		<p>recovery organisations on the basis of market share.</p>	
		14	<p>S.L 549.43. Sub-Regulation 7 of Regulation 13: An authorised packaging waste recovery organisation</p>	<p>Sub-Regulation 8 of Regulation 13: An authorised packaging waste recovery organisation shall finance any systems set up by the Regional Councils for the door-to-door collection, treatment,</p>	<p>The statement shall be substituted by the following statement: An authorised packaging waste recovery organisation</p>	<p>Comment has been noted.</p>

			shall finance any systems set up for the collection, treatment, recovery and environmental ly sound disposal of municipal packaging waste generated:	recovery and environmentally sound disposal of all municipal packaging waste generated, according to its annual market share:	shall finance any systems set up by the Regional Councils in agreement with the authorised packaging waste recovery organisation for the door-to-door collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste generated, according to its market share	
		15	S.L 549.43. Sub-Regulation 7 of Regulation 13: An authorised packaging waste recovery organisation shall finance any systems set up for the collection,	Sub-Regulation 8 of Regulation 13 An authorised packaging waste recovery organisation shall finance any systems set up by the Regional Councils for the door-to-door collection, treatment, recovery and environmentally sound disposal of all municipal packaging waste generated,	'Annual market share' shall be substituted by 'Market share'	Comment noted and proposal addressed.

			treatment, recovery and environmental ly sound disposal of municipal packaging waste generated:	according to its annual market share:		
		16			Market share shall be established upon the submission of the Annual Report by the authorised packaging waste recovery organisation and self-compliant producers to the competent authority within four (4) calendar months of the closing of the year as per Regulation 10 of L.N. 152 of 2021.	The method to calculate the market share based either on declarations submitted by the PROs or the audited annual reports has been included in the draft LN as detailed in Schedule 18.
		17		Sub-Regulation 10 of Regulation 13:	The statement shall be substituted by	As per above.

				<p>The market share referred to in sub-regulation (8) shall be established by the Authority on the basis of the latest audited annual declaration submitted by the authorised packaging waste recovery organisations in accordance with regulation 17(1).</p>	<p>the following statement:</p> <p>The market share referred to in sub-regulation (8) shall be established by the Authority on the basis of the latest Annual Report submitted by the authorised packaging waste recovery organisations and self-compliant producers in accordance with regulation 17(1)'</p>	
		18	<p>S.L.549.43 - Sub-Regulation 2 of Regulation 16</p> <p>For the purposes of achieving the objectives of these regulations,</p>	<p>Sub-Regulation 2 of Regulation 16</p> <p>For the purposes of achieving the objectives of these regulations in a cost-effective manner, producers are obliged to join a packaging waste recovery organization duly authorised by the competent authority for all</p>	<p>A producer that generates consumer packaging and transport packaging shall be part of an authorised packaging waste</p>	<p>This proposal falls outside the scope of this public consultation.</p>

			<p>producers are obliged to join a packaging waste recovery organization duly authorized by the competent authority for all packaging placed on the market: Provided that producers can opt to be self-compliant for transport packaging or the share thereof placed on the market</p>	<p>packaging placed on the market: Provided that producers can opt to be self-compliant for: (a) transport packaging or the share thereof placed on the market; and, or (b) sales packaging consisting of refillable gas cylinders, if they demonstrate to the satisfaction of the Authority that systems for the environmentally sound reuse of used gas cylinders and the environmentally sound management of waste gas cylinders are in place.”</p>	<p>recovery organisation.</p>	
		19	<p>S.L.549.43 - Sub-Regulation 7 of Regulation 24: Where an authorisation granted under sub-regulation (4) is due to expire, an authorised</p>	<p>Sub-Regulation 7 of Regulation 24: In sub-regulation (7) thereof, the words “not later than one (1) month before the expiry of the authorisation” shall be substituted by the words “not later than six (6) months before the expiry of the authorisation”</p>	<p>The statement shall be substituted by the following statement: not later than one (1) month before the expiry of the authorisation” shall be</p>	<p>Comment noted and proposal has been addressed.</p>

			packaging waste recovery organisation that wants to continue to operate as an authorised packaging waste recovery organisation shall, not later than one (1) month before the expiry of the authorisation		substituted by the words “not later than three (3) months before the expiry of the authorisation.	
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