

ANNEX A

Public Interest Test – EIR

Reference Number – DAERA/26-286

Requested Information

In relation to DAERA/26-286

Access to information relating to the registration, accreditation, and reporting of UK packaging waste reprocessors and exporters for the 2026 compliance year in N Ireland.

This request relates to organisations listed on the public register of accredited and registered reprocessors and exporters of packaging waste, link below. <https://www.gov.uk/government/publications/epr-for-packaging-list-of-registered-and-accredited-reprocessors-and-exporters>

1. Reprocessors – materials and recycling capability

For all registered and/or accredited reprocessors of plastic packaging waste, I request:

- The materials for which each reprocessor is registered and/or accredited (including plastic sub-types where specified)
- Details of the recycling or recovery processes declared in their application (including descriptions of how plastic waste is processed)
- Any sampling and inspection plans (SIPs), or equivalent documentation, describing:
 - input material specifications
 - contamination thresholds
 - outputs and end products
- Any information submitted on:
 - processing capacity
 - efficiency rates
 - or recovery yields

2. Reprocessors – reporting data

For the 2026 reporting period (or latest available):

- Tonnage of plastic packaging waste received
- Tonnage of plastic packaging waste actually recycled
- Details of suppliers of packaging waste (where recorded)

3. Exporters – destination facilities

For all registered and/or accredited exporters of plastic packaging waste, I request:

- The names and locations (including country, name and location of destination factory) of all overseas reprocessing facilities declared in:
 - registration applications
 - accreditation applications
 - or evidence submissions

- **Any supporting evidence submitted to demonstrate:**
 - “broadly equivalent standards” (BES)
 - environmental or operational compliance of receiving facilities

Annex VII / shipment-level data (if held)

- **Copies of, or datasets derived from, Annex VII documentation or equivalent reporting relating to plastic packaging waste exports**

Exemption / Exception under consideration

Environmental Information Regulations 2004 - Regulation 12(5)(e) - adversely affect the confidentiality of commercial or industrial information.

Reasons why the public interest would favour disclosure:

- Regulation 12(2) requires DAERA to apply a presumption in favour of disclosure.
- DAERA is committed to conducting its business in a manner that is as open and transparent as possible.

Reasons why the public interest would favour withholding:

- Identification of individual companies (albeit initially anonymised) may be possible, as there are only three registered/accredited plastic packaging waste reprocessors in Northern Ireland and two have recorded zero returns.
- The release of the registration applications, accreditation applications and Sampling and Inspection Plans would reveal the reprocessors’ internal operations and provide strategic business information.
- The release of tonnages reprocessed by specific operators would reveal their operational scale, detail their production capacity and provide strategic business information. Release of suppliers’ details would provide an unfair advantage to their competitors.
- The release of details overseas reprocessing sites and broadly equivalent standards would reveal the registered and accredited exporters’ customers in whom have invested heavily in establishing a business relationship with which would provide an unfair advantage to their competitors.
- The release of the Annex VII documentation would provide details of suppliers and overseas reprocessing sites of registered and accredited exporters and as such would provide an unfair advantage to their competitors.

