**5th May 2023**

Via email to efracom@parliament.uk

## GS1 UK Response to: Resources and Waste provisional Common Framework Inquiry

GS1 UK is a not-for-profit membership body that sets and enables global standards across industry. Our standards are used ten billion times per day and form the basis of a global business language that identifies, captures and shares key information on products around the world – with the best known being barcodes and QR codes.

GS1 Standards have formed the backbone of traceability and supply chain logistics for almost 50 years across many different industries (most notably in retail and healthcare). Globally our standards are being used to underpin a range of environmental measures, policies and responsibilities, such as Deposit Return Schemes and Product Passports.

We welcome the opportunity to respond to the call for evidence on the Resources and Waste Provisional Common Framework, however we are concerned that the framework appears to be a reactive rather than proactive mechanism.

We would like to see the framework that encourages discussion and investigation into how common agreed standards can enable policy divergence in this area, across the UK.

In addition, the framework also offers little detail into when and how industry may be invited to provide solutions. We believe these are the two key areas where the framework can look to be improved upon.

We have gone into more detail in response to the relevant questions below. If you would like further information on our response, or clarification, please do contact us using the details at the end of this document.

Kind regards,

Daniel Bellis

Head of Policy

GS1 UK

**Are the processes outlined in the Resources and Waste provisional Common Framework sensible or will they present any practical challenges or unnecessary burdens for stakeholders?**

Although the framework addresses in some detail the processes for different levels of officials and Government, it does little to address the role of industry in decision making, or information sharing.

The framework simply says that where required a clear process for external stakeholder engagement will be agreed. No additional information or guidance on when or how external stakeholders should be consulted is given.

This lack of guidance is concerning as decision making could often be made without the full information to hand, as it may be considered quicker and easier to simply push ahead at official level.

We have seen this kind of decision making before, and often leads to organisations such as GS1 UK having to almost reverse engineer standards such as the barcode into existing policy. For example, the implementation and roll-out of Deposit Return Schemes (DRS) across the UK.

Whilst our standards are used globally (over ten billion times every day) they are often misunderstood and underutilised by policy makers. They could, for example, be used to ensure that each nation within the UK can have divergence within its own DRS policy, whilst enabling businesses and manufacturers to supply to the whole of the UK market via a single product line. i.e. avoiding the need to run separate lines for each nation because of the policy differences.

In our view, the framework as it stands would offer limited opportunity for ourselves as a not-for-profit to contribute to the conversations surrounding interoperability of resource and waste management systems across the UK. We would therefore like to see this element of the framework built upon in more detail.

**Will the Common Framework strike the right balance between enabling "the functioning of the UK market" while also allowing for policy divergence and enabling the UK to enter into and implement international agreements?**

The framework itself is a mechanism for dialogue between different levels of government, and governments. We would strongly encourage this level of dialogue and early engagement on issues that may affect trade across the UK. However, only the outcome of these conversations and common policy will enable the functioning of a UK market.

The framework currently looks to share information and address policy divergence issues as and when they arise, rather than taking a strategic overview. We believe this is a missed opportunity to explore how common standards across the UK can enable policy divergence without acting as a hinderance to industry or consumers.

Although the common framework is primarily to facilitate discussing and sharing of policy positions as they are being formulated, the framework should have a greater mission to enable policy divergence via the use of shared common standards.

As mentioned previously, GS1 standards (most notably the barcode) are already used across industry and especially prevalent in the packaging, retail and waste sectors. They are already used by thousands of UK manufacturers to supply their goods into multiple retailers, and interoperable with a number of different systems, solutions and providers.

**Should the Common Framework set out further policy detail and if so where?**

Yes, we believe the Single Common Framework should set out more detail into the types of circumstances where industry may be engaged, and the mechanisms available to do so.

**What risks are posed by policy divergence in resources and waste policy and does this provisional Common Framework address these concerns?**

There are many risks to industry, as well as circular economy targets, in the divergence of resource and waste policy across the UK.

For industry, the worst-case scenario is that the same product must be run on four different lines because of differences in each nation within the UK. For example, where England, Scotland, Wales and Northern Ireland each mandate their own unique recycling logo and information on the packaging.

This results in an exponential increase in manufacturing costs, but also logistical issues ensuring that the correct product gets to the correct nation, despite the contents remaining the same.

We have already seen some of these concerns come to fruition, with some drinks manufacturers deciding to discontinue certain product lines in Scotland, due to its early introduction of DRS. As a result, costs increase, productivity decreases and consumers are faced with less choice and competition.

An additional challenge is then created when a product crosses a border via the consumer. For example, where a drinks container may have been purchased in a Scottish motorway service station, but then driven into England and recycled into a different policy infrastructure. The lack of common standards in the resource and waste infrastructure across the UK may make simple drinks containers entirely incompatible in different nations.

The common framework itself does not address these issues directly, but rather provides a framework where policy makers can discuss these differences as they arise. We believe that the framework must be more proactive to enable policy divergence across the UK whilst investigating how common agreed standards can enable this. There is a real danger that if the framework becomes too focused on some of the individual issues mentioned above, it may miss the overall goal and solution – common standards across the UK, working interoperably across different policy landscapes.

**Will the Common Framework help the UK move towards a circular economy for its waste and resources?**

Greater dialogue between decision makers and implementors within the four nations of the UK will undoubtedly assist in more joined up thinking, but only if discussions result in meaningful actions.

In order to establish a circular economy for waste and resource across the UK, we must enable full traceability across our different policy landscapes. Without this, it will become incredibly difficult to measure and establish a fully circular economy, as each nation may place different traceability requirements on essentially the same product. This adds increased cost, inefficiency, and difficulty in tracing products crossing borders.

Again, a common framework should go as far as to look at common interoperable standards used across the UK and in industry, and form a working group, so that future policy decisions are made with these interoperable standards in mind. Agreement to adopt standards within a framework would allow for policy divergence, whilst providing a common thread and delivery method across the UK.

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