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**Sent:** Thursday 10 June 2021 17:12  
**To:** circulareconomy  
**Subject:** Circular Economy Strategy Consultation Response - Irish Food Packaging Alliance  
**Attachments:** IFPA Submission - Circular Economy Strategy\_Final.pdf

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To whom it may concern,

Please find, attached, a response on behalf of the Irish Food Packaging Alliance in response to your call for submissions to inform the Circular Economy Strategy and the development of its subsequent Implementation Plan.

The IFPA members acknowledge the requirement to transform the way we produce our goods in order to improve circularity, meet our carbon reduction targets, and thus address the climate emergency. In this regard, we are eager to be a collaborative partner with the Department of Environment, Climate and Communications as Ireland makes this considerable transition.

We look forward to continuing to engage with you over the coming months.

Kind regards,  
Ken

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## **IFPA Submission:**

### ***Circular Economy Strategy Consultation***

The Irish Food Packaging Alliance (IFPA) welcomes the opportunity to make the following submission to inform the Ireland's Circular Economy Strategy. The IFPA members acknowledge the requirement to transform the way we produce our goods in order to improve circularity, meet our carbon reduction targets, and thus address the climate emergency.

With significant expertise in the design and manufacture of plastic food packaging we are already advanced in our journey to becoming a more circular sector. However, there remains significant barriers to greater circularity, which we seek to address in this submission.

In this regard, we have addressed questions 8 & 9 in the consultation document, regarding which "regulatory and non-regulatory barriers" exist and inhibit the development of a circular economy.

#### **1. Need for domestic recycling infrastructure.**

Ireland currently lags behind its EU peers in terms of circularity. In 2019, Ireland's circular material use rate (which measures the share of material recovered and fed back into the economy - thus saving extraction of primary raw materials - in overall material use) was the second worst in the EU. Ireland's rate was 1.6%, compared to an EU average of 11.9%.

This fact highlights the failure of Ireland to invest in an effective domestic waste management infrastructure. The issue can be seen perhaps most acutely in the context of plastics. There is currently little domestic recycling of plastic in Ireland. Instead, plastic in Ireland is collected, sorted and exported for recycling.

**Support re-processing:** The Waste Action Plan for a Circular Economy notes that there will be a review of the role of the State in supporting the development of indigenous recycling infrastructure. At present, IFPA member, Shabra Recycling & Plastics, which recycles 100 tons of plastic bottles per day, is Ireland's only genuine recycling facility of scale. All other facilities merely sort, collect and wash recycle, after which it is largely exported for recycling. This points to an environment which has not supported the development of an indigenous 'recycling' sector. Thus, we must ensure that the domestic policy environment is supportive of not only the collection, sorting and export of waste, but also the re-processing, re-manufacturing and ultimately recycling of our resources domestically. Our view is that to-date in Ireland, policy has been too supportive of collection for the purposes of export, and this needs to be changed.

**Maintain access to recyclate and improve the policy environment to support its use:** Our members across both the soft and rigid sectors have reported recent improvements in access to high-quality, food-grade recyclate. While historically this has been challenging, our members would like to work with regional waste management organisations (RWMO) to develop policies that further support the return of pots, tubs and trays to their producer of origin; and of film to soft plastic manufacturers. The IFPA members note and welcome the fact that the Department will examine measures to support increased use of recycled materials in packaging. In this sense, we see the operation of eco-modulated fees as a significant opportunity for Ireland, and one that is being currently missed.

As the IFPA has previously advised the Department, aligned to the Circular Economy Strategy, a more granular approach to EMF design will likely result in a range of benefits across the packaging sector. In particular, the use of 'bonus fees' for products which use recycled content should be prioritised. This is in keeping with the Department's ambitions of increasing the amount of recyclate being used in Ireland.

France currently has one of the most ambitious programmes of supports for the use of recycled content through extended producer responsibility in Europe. Its producer organisation, CITEO, has developed bonus fees which encourage the use of recycled content for polypropylene, polyethylene and even polystyrene packaging. This would not only act as an incentive to design more sustainably, but also as a boost for the domestic recycling sector, at a time when the cost of virgin resin is especially low.

We also note that the European Parliament's Committee on the Environment recently adopted a report calling for minimum requirements of recycled content. Should Ireland introduce bonus fees for using recycled content in the EMF design, this would ensure that Ireland was ahead of any developing EU regulations.

**Expand the breadth of products we can recycle:** The IFPA consistently advises that rather than merely increase the amount of product that is currently recycled, the breadth of products being recycled should also be increased. To this end, it is essential that facilities are developed which can handle less attractive products such as multi-polymer soft plastics and coloured rigid plastics. This could include supports for processes such as:

- **Chemical depolymerisation** which can produce monoethylene glycol (MEG), used in the production of polyester fibres and film, polyethylene terephthalate (PET) resins and engine coolants;
- **Pyrolysis** which can recycle troublesome polymers such as polystyrene and polyethylene into new feedstock; and
- **Gasification** which can create ethanol and thus create polyethylene.

## **2. Limiting Food Waste & Carbon Emissions**

While reducing plastic waste is rightly a policy priority in areas where circularity cannot be achieved, this should not come at the expense of increasing our overall carbon footprint. Our members have grave concerns regarding the promotion of "packaging free" options among consumers, without close consultation with the packaging and

food sectors and consideration of the unintended consequences this could have on food waste targets which impact overall carbon reduction targets.

Plastic packaging helps keep our food fresher for longer, meaning that we reduce food waste. Plastic helps protect perishable food items from light, oxygen, water and CO<sub>2</sub>, all of which are mediating factors in food degradation. The shelf life of meats such as beef for example can be extended by as much as 5 days with the use of plastic packaging, while fresh vegetables such as cucumbers can be extended by two weeks.

According to the United Nations, if food waste were a country, it would be the third largest global greenhouse gas emitter, behind only China and the United States. Ireland generates approximately 1 million tonnes of food waste per year, which represents a carbon footprint as high as 3.6 Mt CO<sub>2</sub>eq. Around 60% of this comes from the household and commercial sector. The GHG benefit from prevented food losses as a result of using plastic packaging to protect fresh food is estimated to be at least equivalent to 37% of production emissions of all investigated plastic packaging in a recent study.

Research conducted by Austrian environmental consultancy, Denkstatt, found that food sold without packaging resulted in between x2 – x14 waste.<sup>1</sup> Food waste is the world's second largest contributor to greenhouse gases, accounting for 8% of global emissions.<sup>2</sup> Hence the use of plastic packaging to protect food integrity, prolong shelf-life and reduce overall food waste can in fact have a net positive impact on GHG emissions, as is evidence by separate research from Denkstatt.<sup>3</sup>

Food	Alternative packaging	Plastic packaging
Steak 330 g	34% food waste (foil)	18% waste (composite foil)
Cheese Bergbaron	5% food waste (open sale)	0.14% food waste (plastic tray with foil)
Cucumber 350g	9.4% food waste (open sale)	4.6% food waste (PE film)
Bread 400g	11% food waste (open sale)	0.8% food waste (PP film)

In this regard we would urge that any policy directed at eliminating packaging must first have a carbon impact assessment carried out to ensure it is having a positive effect on Ireland's carbon footprint. Increased plastic waste is a significant issue, but simply banning or moving away from plastics products is not a viable solution.

### Case Studies

<sup>1</sup> [https://www.save-food.org/cgi-bin/md\\_interpack/lib/all/lob/return\\_download.cgi/3\\_interpack\\_2017\\_denkstatt\\_Packaging\\_Food\\_Waste\\_Prevention\\_V1.0.pdf?ticket=g\\_u\\_e\\_s\\_t&bid=5684&no\\_mime\\_type=0](https://www.save-food.org/cgi-bin/md_interpack/lib/all/lob/return_download.cgi/3_interpack_2017_denkstatt_Packaging_Food_Waste_Prevention_V1.0.pdf?ticket=g_u_e_s_t&bid=5684&no_mime_type=0)

<sup>2</sup> Food wastage footprint & Climate Change, the Food and Agriculture Organization of the United Nations.

<sup>3</sup> The impact of plastic packaging on life cycle energy consumption and greenhouse gas emissions in Europe, Denkstatt, 2011

As referenced earlier in this document, the IFPA members acknowledge the requirement to transform the way we produce our goods in order to improve circularity, meet our carbon reduction targets, and thus address the climate emergency. Below, IFPA members have shared examples – both in rigid and soft plastic – of the efforts they are making to drive circularity in their businesses from eco-designing their products to recyclable materials, to developing new processes which will help increase PET collection rates in Ireland.

### **Recyclable Packaging: 100% Polyethylene Mono-Material**

Conscious of the need to innovate to develop more sustainable packaging solutions, and in response to the Government's requirement for Member States to implement eco-modulated EPR fees, IFPA member Alert Packaging has developed a 100% polyethylene mono-material packaging option which is completely recyclable. This is a preferred format for many multiples including Tesco and Aldi with others following suit.

This flexible material can be deployed for a range of packaging solutions and formats including pre-made stand up pouches and roll fed film for

form fill & seal, pillow packs or sachets. These products are ideal for a range of existing products including:

- *Grains and nuts*
- *Confectionary / Snack Foods*
- *Pet food*
- *Protein bars*

This recyclable material provides a strong barrier against oxygen, aroma, flavour and mineral oils providing producers with a high quality and adaptable product. This is complemented by an excellent moisture barrier on the surface and seal. Furthermore, this product is chlorine free and contains no PVdC. Collectively this ensures that producers and retailers get a product that is effective, attractive, and most importantly sustainable.

The use of polyethylene as a flexible packaging stands up to the major circular economy principles of reduce reuse and recycle.

Flexible packaging means more with less: less waste, less energy, less resources used and reduced costs. Flexible packaging packs more than 40% of food products in Europe while only using 10% of all consumer packaging materials. Flexible packaging allows for outstanding low packaging-to-product ration, while helping to reduce food waste. New Print Technology of fixed and expanded gamut allow for reduction in ink usage whilst not compromising brand / design excellence, indeed customers have found it shorten the product introduction cycle.



Flexible packaging is essential for processing, storing, transporting, protecting and preserving products. Re-closable packs such as plastic stand-up pouches help to keep food that has been opened in peak condition for longer. Ultimately, multi-use packaging which is more effective and efficient means there is less waste of resources on the impact on the environment is reduced.

The product is already in use on a range of products in the leading multiple retailers across Europe and in the UK.

### ***Keoghs Crisps***

Alert Packaging has recently launched a new recyclable polyethylene mono-material pack with a tactile finish for Keogh's Crisps. This new crisp packet is recyclable, providing a high barrier, perfect for crisps and many other food products. Major retailers in Ireland & the UK recognise the importance of recyclable packaging and have established collection points in many of their stores. Similarly, some of the waste management companies are starting to roll out initiatives for recycling soft plastic PE.

### **Case Study**

#### ***Shabra Plastics and Recycling - Tidy Towns Plastic Bottle Recycling Initiative***

In Carrickmacross, Shabra Plastics & Recycling has partnered with SuperValu and a food packaging producer to develop a circular economy project to help with its Tidy Town programme. Through the partnership, local residents can bring their plastic bottles to a designated machine which scans the plastic to ensure it is acceptable for recycling. Each bottle has a monetary value which collectively can be retrieved in the form of a printed voucher for use in the SuperValu store.

When the machine is full, the bottles are taken by Shabra Plastics & Recycling to its recycling centre where it is colour sorted and granulated. The granulated material is then washed and dried. The dried flake then goes through two flake sorting machines which will remove any coloured or contaminated flake. It is then bulk bagged ready for transport to its food packaging partner.

When it arrives at the food packaging facility it is crystalised and 'supercleaned' before it is extruded into rolls of sheet plastic. These rolls are then thermoformed into food packaging trays. These trays can be recycled several times, extending the life of the plastic and making better use of the material, while also forgoing the need for additional virgin plastic.

1



SHABRA PLASTIC, THE LEADER IN RECYCLING IN IRELAND IS A PROUD SPONSOR OF TIDY TOWNS PROJECT

2



Bottles are collected

3



Empty Drink Bottles Here

4



BOTTLES ARE SORTED AND SHREDDED

5



Chips are sacked and ready to ship

6



Chilled rollers form molten plastic into food grade plastic sheet

7



The new trays are now ready for use 'completely recycled'