
From: Dermot Brady <DERMOT@abgroup-packaging.com>
Sent: Monday 17 May 2021 12:32
To: circulareconomy
Subject: Public Consultation on the Proposed Publication of the Circular Economy Strategy

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

A Chara

I would appreciate if our submission be taken into account when deciding on the future Circular Economy Strategy for Ireland

We are a paper bag manufacturer based in Blessington , Co. Wicklow since 1985 , over the years we have produced a range of paper and plastic packaging including printed film wrap for crisps , donuts , flour and porridge. Having kept a close eye on world trends and the Environment . We took a very difficult decision 5-6 years ago to exit the plastic packaging market . Today we operate 3 factories in Ireland , Wales and Spain, produce over 1 Billion paper carrier bags , employ approx. 275 people directly and a further 200 indirectly and export from Ireland to over 15 countries including USA . We directly supply Penneys/Primark , Harrods , Selfridges Morrisons, Iceland Foods , Amazon , essentially we supply the high street , the fast food and supermarket in many countries . However , what you will not find is one Irish supermarket or grocery store using our paper carrier bags –

The Why

- no paper carrier bags are sold or offered by supermarkets in Ireland , due to the 70cent rule in place in the **Irish Plastic bag Levy**

- ie every Irish supermarket today charges 70cents for a plastic bag for life bag , that generally costs approx 6-8 cents for them to buy because as per the law , if they sell a plastic bag for 70cents or more they do not have to collect/pay the levy amount on a plastic bag – ie

zero revenue is collected for the government and a profit of approx. 1,100% made on the sale of each plastic bag for life sold

The Who

- Superquinn , Tesco, Dunnes Stores , Aldi , Lidl , Supervalu , Musgraves , Londis , Spar , every Supermarket in the Rep. of Ireland

The Difference it makes in the Market and to the Environment

- because there is no plastic bag levy with a similar threshold level operating in the UK for example . 3 major supermarkets there Morrisons , Iceland Foods and Spar have already moved away from selling plastic bag for life bags and are now offering **RePapaPac – the worlds first ever fully Reusable paper carrier bag** , designed and innovated by our company for our home market but only sold outside of Ireland due to the way the levy has been written. www.RePapaPac.com

This year Morrisons will reduce their plastic bag consumption by over 80 million bags – reducing their plastic usage by approx. 1,100tons/year alone.

The Worlds EPA's & Repak's famous Triangle

- around the world , the various EPA bodies operate a best practices system known as the EPA Triangle

- **REDUCE** At the top and the goal of all – reduce the need to produce more new bags

- **REUSE** In the middle and the interim goal – if we must make something , at least make sure it is reused

- **RECYCLE** least favourite goal of the 3 – ensure at the very least , the product can be recycled and reprocessed

PLASTIC BAG FOR LIFE

Recycle How does the plastic bag for life score , well not very well , as any informed person will know , plastics overall are only recycled at a rate of approx.

9-11% , filling our landfills , seas and waterways , killing fish , birds and mammals .

Reuse very reusable

Reduce poor , as plastic bag for life bags are 6-8 times heavier than single use plastic bags and supermarkets are only offering this option , meaning the

usage of these bags is actually increasing . This has been confirmed as an issue by the Welsh Assembly , England , Scotland and many other European countries.

The awful truth

- No Plastic Bag for Life bags are made in ROI

- No jobs are realised

- No Revenue for the ROI from this product

- Most of these bags are produced in Asia , meaning they have a huge carbon footprint

- None are reprocessed in Ireland

- Unless landfilled or enter our seas and waterways , they are re-exported back out to Asia

- The sad reality is if re-exported out of ROI , most of will end up as another countries waste

The Alternative - **RePapaPac** – a 100% reusable paper bag , fit for purpose , working in the market place and designed and manufactured in Rol

RePapaPac is the worlds first fully reusable paper carrier bag , developed in Ireland for the Irish market place , using the latest technology in paper making , ABGP has successfully brought to the market a paper bag that can be substituted for the Plastic Bag for Life but with none of its negatives as follows ,

- the paper used is 100% FSC/PEFC certified , which ensures a full chain of custody of the product , protects the bi-diversity of the forest the tree comes from with 2 trees planted for every one tree harvested. No hard wood trees are ever used and trees are only harvested at the end of their growing life.
- the paper mill we have developed this paper with , is a member of the Dow Jones Sustainability Index for the last 5 years
- the bark of each tree goes to a bio-mass boiler which creates enough energy needed to make the paper from that tree
- and with the paper being shipped to our Rol and Welsh plants by boat and our plants being run with 100% certified renewable energy (wind or solar) ,
 - RePapaPac ends up being produced , virtually Carbon Neutral
 - RePapaPac is quite unique in that it also achieves all 3 EPA triangle points , as it is
 - * is 100% recyclable in the standard paper waste stream (79% of all paper and board was recycled last year in Rol – Repak annual report 2019)
- * it is 100% reusable as a grocery paper carrier bag and has been tried and tested in the UK market (over 100 million have already been produced , removing that amount of plastic bag for life as a result)
 - * it will reduce significant volumes of plastic bags in Ireland and can be rolled out to other retail sectors , such as white goods and fashion shops .
Replacing the single use paper bag with an even greener alternative
- it is also manufactured 100% in Blessington, Co Wicklow , supporting Irish jobs , by a company with a zero waste to landfill policy that is currently carbon neutral and working towards being carbon negative in the next 18months
- with 100% of ABGP's waste going to our paper mills for certified recycling and reprocessing (documented by ABGP)
- the paper waste stream has also been in place for many years and has stood the test of time , with the entire value chain being consistently able to support all the Stakeholders involved.
- paper from Ireland can and is reprocessed far more locally than plastic with a considerable amount of Irelands waste paper mountain being reprocessed back into recycled paper in the UK and EU.

- the approx. amount of “carbon miles” a container of RepapaPac paper creates is approx. Sweden-Ireland-UK/France which is approx. 1,200km

The approx. amount of “carbon miles” a container of plastic bag for life bags is approx. Fuzhou-Ireland-Fuzhou,China is approx. 19,552km !!

AND THIS IS ONLY AT A RATE OF APPROX 9-11% versus 79% for paper

- Savings for the consumer – RepapaPac is being sold not given away free , in the UK with an RRP of c. 35cents

This saves the consumer approx. 50% over the 70cents/plastic bag cost (we note that Supervalu is selling a compostable bag for 80cents !!

This bag is only compostable under certain conditions , meaning it is NOT composted or recycled in the majority of cases

We estimate that over 110million plastic bag for life is being sold every year in Ireland

This translates into a plastic consumption of c. 1,800tons EVERY YEAR just for the ROI , based on figures we have for this product

In summary , no plastic bag for life bags are manufactured , recycled or reprocessed in ROI . They are the by-product of the worlds number one contributor to the current Climate Change disaster – fossil fuel. And with the green option of RePapaPac manufactured in Ireland and recycled at a rate of 79%. We ask that you consider our request for plastic bags for life to be banned.

If you wish to have any other information regarding any point above please do let me know



Kind regards

Dermot Brady

CEO

Tel: [+44 \(0\) 7581468723](tel:+35307581468723)

dermot@abgroup-packaging.com

abgpsales@abgroup-packaging.com

www.abgroup-packaging.com

www.reusablepaperbag.com

Blessington Industrial Estate · Blessington, Co Wicklow · Ireland

T: [+353 \(0\) 45 865611](tel:+353045865611) F: [+353\(0\) 45 865026](tel:+353045865026)

More paper = More Forests



The Reusable Paper Bag
Earth's friendliest alternative
www.reusablepaperbag.com

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

© Copyright AB Group Packaging. Version 1.0