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Please find attached submission from Nestlé Ireland.

With thanks in advance for your consideration.

We are most happy to provide further information or indeed meet with you if you would like further information.

Siobhán

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## **Nestlé Ireland submission, June 2021**

### **Proposed Publication of the Circular Economy Strategy**

#### **Introduction**

Nestlé Ireland welcomes the opportunity to respond to this consultation. As the world's largest food and drink company we recognise that we have a pivotal role to play in driving a more circular system, and that transformational change is something that requires a whole-system approach, sharing responsibility amongst all actors in the value chain.

In 2020, we committed to net zero emissions by 2050, halving these by 2030, and launched our [Global Net Zero Roadmap](#) which sets out our plans to achieve this. Since launching the Roadmap a number of our iconic brands including Nespresso and KitKat have announced their plans to reach carbon neutrality within this decade, and we continue to work with partners throughout our value chain to transform our operations.

As members of Food Drink Ireland (FDI) we have fed into and support their response in addition to outlining some further comments below.

#### **General Comments**

Nestlé Ireland support the objectives set out in the pre-consultation document and we commend the ambition and “transformative approach” shown by the Irish Government. As highlighted in the consultation, countries which have successfully moved towards a more circular system have generally done so with overarching circular economy policies in place.

We recognise that a cohesive framework for all actors – Government, private sector and civil society – with clearly defined priorities and ambitions for each group is a key step in ensuring the Strategy will be successfully adopted. Stakeholder and business engagement, in addition to ensuring businesses are kept abreast of plans and have adequate time to make preparations, are also pivotal to the success of any programme. Raising awareness and consumer understanding of circular economy issues, and how they can be of benefit to individuals, is key to delivering its positive environmental, economic and social impacts.

It is also important to ensure this is pursued in alignment with other policy developments at national and EU level to ensure a joined up and co-ordinated approach is taken going forward, and we welcome the whole-of-Government approach outlined in the document.

We note that the document proposes updating the Strategy in full every 18-24 months. While we appreciate that the Strategy will be an evolving document and there should be space for new opportunities and challenges to be incorporated, we agree with FDI's suggestion that this is revised every five years in alignment with the National Agri-Food Strategy.

## **Repair and Reuse**

Nestlé has committed to ensuring 100% of product packaging is reusable or recyclable by 2025. More broadly, we are supportive of the premise of Extended Producer Responsibility and the “polluter pays” principle, as well as the overarching aim of encouraging producers to ensure their packaging is designed to encourage recyclability.

We recognise that reusable and refillable models offer a solution for a range of items, including some foodstuffs, and we are exploring alternative delivery models partnerships in other markets for a range of dry products including cereals and pet food. However, it is important to highlight that there remain challenges in rolling out these models for products commonly consumed on the go, such as confectionery. Not all products can be supplied via reuse or refill systems for legal reasons, including: pharmaceuticals; baby formula and natural source waters, which have to be ‘bottled at source’. This means that natural source waters can’t be supplied via refill stations by law.

It is important to recognise that consumer communication and building understanding is key to success in this area and we would be happy to share insights from other markets in this area.

## **Actions for the Food Industry**

It is encouraging to see specific inputs for the Agri-food industry in the Sectoral Circular Economy Roadmaps, and as a major food manufacturer, we recognise that there are actions we can take to drive a more circular system.

### **Packaging**

In working towards reaching our 2025 packaging target we inaugurated the Nestlé Institute of Packaging Sciences in 2019, the first of its kind in the food industry, to accelerate our efforts to bring functional, safe and environmentally friendly packaging solutions to market. In 2020, we announced a CHF 2 billion (€1.84 billion) fund to create a market for food-grade recycled plastics and launch a fund to boost packaging innovation.

Nestlé is a member of the European Plastics Pact which brings together businesses from across the value chain to tackle plastic waste and create a circular economy for plastics. As part of this we are committed to eliminating problematic plastics and have created a negative list for difficult to recycle packaging materials with clearly defined dates for these to be phased out.

Ensuring that none of our packaging ends up as litter or in oceans is another key objective of ours, and we are undertaking a number of activities, including pledging employee volunteering time for litter-picking activity and have worked with An Taisce’s Ocean Clean initiative, to enable us to take active steps to deal with the urgent problem of litter.

We recently fed into the Irish Government’s consultation on establishing a Deposit Return Scheme (DSR), and we support the introduction of a DRS as one measure to drive circularity and resource efficiency. However, we note that the timings are very ambitious for implementation and would encourage the Irish Government to ensure there is adequate time to prepare for this.

## **Food Waste**

Acting on food waste is one of our main priorities within the Net Zero Roadmap. As a major manufacturer we recognise the impact of food waste and its contribution to climate change and we are committed to eliminating food waste in our supply chains.

Nestlé Ireland is a member of Repak and also works closely with FoodCloud. As an organisation we have been working in this area for more than a decade, and in 2015 achieved zero waste for disposal (including food waste) across our entire Irish operations. We began publishing our food waste figures in 2018, and we are proud to have reduced our food waste levels by 8.6% using the 'Target, Measure, Act' principles and resources of the Food Waste Reduction Roadmap. Mandatory annual reporting of food waste is a measure we strongly support extending across the whole food industry.

One way we work to reduce food waste is redistribution, and for a number of years we have supported FoodCloud in Ireland. We were the first and still the only manufacturing supplier to FoodCloud to provide a financial donation for every pallet of surplus food we provide for their distribution of surplus produce for charitable use. This is to enable them to become a more sustainable entity and we have acted as an advocate on their behalf to encourage others to follow suit. FoodCloud has the joint benefit of eliminating the need for disposal of any food waste while donating millions of meals to charitable causes.

As a food manufacturer we recognise the important role that packaging plays in preserving food, maintaining safety and extending its shelf life, and that changes to packaging may lead to the unintended consequence of shortening this, and thus increasing food waste. As such we would encourage the Government to develop holistic policy that integrates consideration for any packaging changes and the impact these may have on food waste to minimise the possibility of this happening.

## **Environmental Improvements**

As a business we are committed to investing in the areas around our sites to safeguard the environment and ensure that our actions today do not compromise the ability of future generations to meet their own needs. Nestlé's Wyeth Nutrition factory in Askeaton, Co. Limerick is a verified member of Origin Green Ireland and we have made a number of business commitments on the quality and safety of our products, the protection of the health and safety of our employees and contractors and protection of the environment.

In 2014, we were the first business in Ireland to create and open its own unique butterfly meadow. We created an 1,800 square metre wild-flower butterfly meadow, which will increase the number and varieties of native Irish butterflies in the area. The initiative aims to assist and improve the Irish butterfly population in the local area. Nestlé Ireland and UK has also committed in its 'Creating Shared Value Plan' to seek to provide a butterfly meadow at each of its sites and to play its positive role in each of its local environments.

To celebrate our 40<sup>th</sup> anniversary in 2014, a tree was planted for every employee that has worked at Askeaton since 1974 – over 1,700 indigenous trees – to demonstrate our commitment and passion for environmental protection.

In 2021, Askeaton was the first factory in Ireland, and first Nestlé site in Europe, to receive Alliance for Water Stewardship (AWS) Standard Platinum Certification in recognition of its water stewardship initiatives. The Platinum standard is provided where it has been proven that responsible water policies and initiatives, which lead to water preservation and reduction, are in place throughout a factory are at a highest standard possible, and there is demonstrable engagement with stakeholders in the local catchment area. The Platinum Certification was awarded to Wyeth Nutritional Ireland Ltd after a rigorous independent assessment, which showed water stewardship throughout the factory being undertaken by its management and staff.

We are most happy to offer ourselves to provide any experience or knowledge that could benefit the strategic development or tactics for a circular economy at any point.

**ENDS**

11<sup>th</sup> June 2021