DECC - Call for Expert Evidence - Climate Action Plan 2023
Huhtamaki Cup Print Ltd Submission – Circular Economy Section
September 20th 2022

Consultation Questions	
1. What are the main barriers to consumers embracing the Circular Economy, e.g. lack of awareness, increased costs compared to disposable products, lack of access to circular goods and services?	• An absence of recycling pathways and infrastructure investment: (Ireland Thinks Poll June 2022 showed that 67% of respondents think Government should prioritise increasing pathways to and capacity for recycling or composting facilities over legislation intended to levy consumer products. Additionally, a 2022 survey by EPA shows that 75% of people believe recycling correctly is the first step to driving environmental change). Although education will always be important, individuals that wish to place appropriate waste in segmented street furniture do not have those options available to them in the vast majority of public locations. This infrastructure is required regardless of prohibition of specific items. We should look to Best Practice in other European countries that have invested in waste segregation infrastructure in their cities and towns. • An absence of involvement by government with local authorities during the legislative process regarding street furniture provision. It would be best that Local Authorities are engaged with and encouraged to allocate annual budgets towards waste segregation infrastructure. This will ensure that a truly Circular Economy is achieved. • An absence of Lifecycle Analysis approach to deliver fact-based decision-making according to EU Directives. It is critical that legislative options are considered with the environmental facts of Lifecycle Analysis. LCA ensures that existing and new products to market are considered from an environmental impact perspective - from their design to end-of-life. It must be ensured that new products to enter the market do not result in increased circulation of plastic or other environmental impacts.

[redacted]

	• An approach of penalising instead of incentivising consumers and vendors to adopt circular solutions, especially with regards to packaging, where renewable fibre has clear advantages over petro-chemical-derived plastic materials, yet recent legislation contradicts this ethos. In the spirit of circularity, punitive measures for single-use items could start with non-renewable or the least renewable items. Legislation could target overall plastic content - starting with 100% plastic items – to make the greatest strides towards meeting plastic reduction targets. Other EU states have demonstrated this by setting progressive levies with plastic % targets or gross weight of plastic targets to incentivize reductions.
	  • For example:
	  • Italy has chosen to exclude all single-use packaging with less than 10% plastic from SUP related tax.
	  • France has chosen to reduce the amount of plastic by banning 100% plastic cups, while allowing paper cups with up to 15% plastic until end 2022, reducing to 8% plastic content by 2024
	  • Spain has chosen to take measures to reduce single-use packaging by way of plastic weight reduction targets (50% 2026, 70% 2030, with 2022 as the baseline year) & moving away from packaging with >10% plastic by 2050
	• Advanced engagement with fibre packaging manufacturers on alternative workable solutions ahead of legislation by government could result in many solutions, notably in product design for circularity, that deliver options likely to be attractive to consumers that wish to embrace renewable packaging. This type of engagement has been positively demonstrated with the plastics industry on initiatives such as deposit return schemes. The approach the government has taken with the plastics industry has encouraged incentives to recycle, without punitive actions in place for

	consumers regarding the use of plastic bottles or caps for example. The fibre packaging industry and operators would welcome similar positive engagement with government to achieve circularity for renewable, recyclable, organic fibre packaging • Whilst mandating for compulsory segmentation for backdoor collection within the Circular Economy Bill, which is welcomed, government has simultaneously prohibited items with legitimate pathways to circularity. For example, compostable items such as paper cups certified to Cré standards, EN13432 or those meeting criteria for paper recycling processing via waste path 13 are not consistently accepted in the appropriate backdoor streams – while other containers and packaging meeting these standards can be collected and contribute to circularity. (E.g., a compostable salad bowl with the same material composition and certification can be processed.) It is also worth noting that many items with lower fibre percentage in their composition are specified as processable within recycling streams but many fibre items, such as paper cups with <5% plastic are not. E.g., Compound materials – such as Tetrapak (paperboard, aluminium/polyethylene) or liquid packaging board (Approx. 80% paper.) • Designing for circularity is disincentivised via legislation that has the scope for blanket prohibition of items for single-use consumption. Whereas earlier engagement with and the facilitation of industry to demonstrate the viability of recoverable materials and to design solutions with circularity in mind would lead to positive environmental outcomes • Consumers may have legitimate concerns that reusable alternatives to disposable items are high in plastic or other non-recyclable content that is not made from recovered, recycled resources contributing to further plastic, ceramic or glassware waste going to landfill
2. What other opportunities exist to support decarbonisation through	• Ensure that robust, systems-based ISO 14040 and 14044 compliant Lifecycle Analyses (LCA), using Primary Data determine in which contexts either

	the acceleration of a transition to the circular economy?	single or multiple-use items deliver the best overall environmental outcomes, in line with EU Waste Directive 2008/98/EC, article 4§2. Without a full LCA approach it is impossible to examine the entire value chain of products and materials in circulation in order to determine their actual net carbon contribution or cost. For example, a Life Cycle Analysis Study by Ramboll in 2021 compares current, paper-based single-use versus multi-use packaging in the context of European dine-in QSR (Quick Service Restaurant). The study findings demonstrate that reusables produce 2.8X more carbon dioxide and consumes 3.4 times more freshwater than single use, paper-based products. This type of 'lifecycle thinking' that the EU Waste Directive specifies, via a robust data set focuses on the facts relating to decarbonisation and other key environmental metrics in order to drive more meaningful decision making on policy approach or legislation. (Executive Summary attached.) • Opportunities exist to facilitate domestic recycling of valuable, recyclable materials that are in great demand and are truly circular if appropriate investment is made. Offering incentive to invest in this infrastructure may aid the acceleration of greater transition. For example, in terms of infrastructure, in Ireland one area that could enable steps to more on-island recycling could be to raise investment towards funding optical sorting enhancements or to technologies to encourage innovation in labelling standards and eventually funding profitable fibre recycling facilities to fulfil demand for recovered fibre, whilst achieving circularity via incentive for investment. • Shaping of best-in-class Extended Producer Responsibility schemes by engaging with all stakeholders on scheme administration, enforcement and meaningful distribution of funds raised to support circularity, decarbonisation and transition phases. E.g., in the UK, very successful workshops between the Department for Environment, Food and Rural Affairs and industry representation on the Extended Producer Responsibility Scheme Administrator group have

	delivered consistent and meaningful progress on targets, accountability, whole-value-chain emissions, whole-system resource efficiency, clear duties, responsibilities and autonomy. Industry has been willing to engage early and wholesale with government to meet shared goals and deliver consistent treatment to products according to material composition and impact on resources. UK government has enabled, via a not-for-profit industry-driven scheme organisation, great levels of transparency and accountability to meet legal requirements and agreed, meaningful goals across the sector. • Engagement with industry on how design can provide opportunities for both commercial and environmental goals. A simple packaging design guide is all that exists at this point and the legislation in play represents several contradictions when compared to the principles of circularity within this design guide document • In an age of food insecurity, where shelf-life becomes more and more critical, fibre packaging has a huge role to play in protecting food and preventing waste and reducing transport fuel consumption while reducing the reliance on plastic. Demand for further fibre packaging will drive more planting of renewable, PEFC and Forestry-Stewardship Council compliant resources and encourage more widespread, diverse forestation to feed a more circular value chain. A more comprehensive and measured approach and engaging early with industry would ensure any precedents set embrace renewable, truly circular, fibre packaging as opposed to enabling further linear, petro-chemical-derived plastic consumption. For example, the Ramboll Report referenced above outlines how a switch to reusable systems does not in fact deliver a better overall environmental outcome than renewable, fibre-based single-use solutions. • An opportunity to enable decarbonization and circularity for all packaging items, under consistent methods of treatment, should not be missed. This would avoid contradictions in what precedents are

	set by a less holistic approach. Levies are an additional tax on consumers, with no levy funds raised contributing towards vital infrastructure and are a significant burden on business. Currently, a levy is intended as an interim behavioral change on one specific item, to be followed by outright prohibition. This entails consumer taxation that is designed to be temporary and does not contribute towards infrastructure for all single-use items to enable circularity. The same shortfalls in enabling circularity would exist following prohibition of specific single-use items. Using a holistic approach, government could carry out Lifecycle Analysis of various materials in circulation, classify them appropriately and then apply treatment appropriately and consistently via either incentives or punitive measures that contribute towards enhanced infrastructure delivering true circularity. For example, legislation could target overall plastic content - starting with 100% plastic items – to make the greatest strides towards meeting plastic reduction targets. Other EU states have demonstrated this by setting progressive levies with plastic % targets or gross weight of plastic targets to incentivize reductions.
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