

Single Use

From: [REDACTED]@btinternet.com>
Sent: Friday 25 November 2022 14:51
To: SingleUse
Subject: single use

AVA: The Vending & Automated Retail Association is the trade association of the vending and automatic retail industry, representing machine and ingredient manufacturers and suppliers, cup manufacturers and vending machine operating companies throughout the United Kingdom and Ireland. Vending operator companies in membership represent approximately 80% of the turnover of the vending industry in the two countries.

The vending and coffee services industry in Ireland comprises some 121 companies employing around 2,000 people, serving hundreds of clients and thousands of their employees. The industry has an annual turnover of approximately €74 million², a figure which is supplemented by those employed within the wider vending channel supply chain. There are over 20,000 operated machines in Ireland² vending snacks, food, soft drinks, water, hot and cold beverages, including around 9,000 beverage machines vending approximately 40 million drinks a year². The majority of these will be hot only machines but some will vend both hot and cold drinks. In these machines the same cup will be used for both hot and cold drinks.

Vending operator companies, those who provide, fill and maintain vending machines, automated retail and office coffee services, are with one or two exceptions, small or medium sized companies, often family owned, with a small administrative staff. Many such companies operate across both sides of the border.

The majority of hot drinks machines are located in business premises; providing the refreshment needs of workers in offices, factories and hospitals or providing hospitality in other locations such as hairdressers and garages. These are “closed sites” where the drinks are consumed on site and there is ready access to bins and recycling. In contrast to other retail channels a single use beverage cup used in vending is unlikely to end up as litter outside a building.

Because drinks vending machines are used for the refreshment of workers in business and industry, workers tend to use them several times a day, as opposed to the more occasional purchase from the high street, so that the financial impact of any levy on the consumer would be more serious, of the order of a euro a day. Where there is a charge for a vended beverage, the average retail price across the industry is 46c². The proposed 20c cup charge would be a nearly 50% increase in price for vended coffee. Many of the sites in which machines are used do not have facilities for washing up. Before single use cups are subjected to a levy, trials should be carried out to identify efficient ways of replacing them. Short term trials in the UK have demonstrated that this is not a “one size fits all” situation and a number of different approaches are needed to cover all the situations in which single use cups are currently used. It is also worth noting that reusable cups are not all the same as illustrated by the recent ban on so-called bamboo cups which are little more than melamine formaldehyde resin with a bamboo fibre filler and do not comply with Regulation 10/2011.

The majority of hot beverage machines are operated on “free vend”. These machines are not fitted with a payment system so there is no mechanism to charge the consumer the 20c per cup. Many of the sites in which these free vend machines are located would not have the administration necessary to account to the government for the levy. These machines, and indeed most modern automatic drinks machines, can use either a single use cup or a reusable cup but automatic

machines fitted with a payment system would not have the technology necessary to alter the price of the drink depending on the cup.

Payment systems used in vending machines do not have the facility to issue a receipt and clearly no receipt would be issued where a machine is operating on free vend.

The majority of single use vending cups used in Ireland are paper cups with a thin polythene lining. These are recycled by a number of paper mills in the UK and it has been shown that recycling systems can collect a high quality single product stream. The fibre from paper cups collected through these streams is desirable for a number of uses from cardboard to high grade packaging products. The introduction of other types of cup does not improve the situation since the consumer cannot tell the difference between a polythene lining or one of PLA or acrylic, and many claims are made for the recyclability or composability of cups that cannot be substantiated. In particular composting facilities cannot tell the difference between one type of cup and another and so reject all.

Hot drinks machines can take cups of different sizes and the size of cup offered is generally agreed between the client and the machine operator company. The machine has sensors in the cup station which recognise that a cup is present. This allows the use of a reusable cup, but the sensors may not be located in such a way as to distinguish between a 175ml cup and a 220ml cup. The cup tray will allow excess liquid to drain away but a 175ml reusable cup that has received 220ml hot liquid will be full to the top and difficult to carry safely. The boiler in a fresh brew hot drinks machine is controlled to around 95 °C and the dispensed drink will be around 90 °C.

References:

- 1: AVA 2021 Annual Census
- 2: European Vending and Coffee Service Association Vending Market Report 2021
- 3: AVA Research 2022


Sent via BT Email App

Single Use

From: [REDACTED]@the-ava.com>
Sent: Friday 25 November 2022 13:15
To: SingleUse
Subject: AVA Circular Economy (Environmental Levy) (Single-Use Cup) Regulations 2022 Response

Please find below the submission to this consultation from AVA: The Vending & Automated Retail Association.

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Regards,

[Redacted Signature]

Chief Executive



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Automatic Vending Association registered in England No: [Redacted]

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