

Single Use

From: [REDACTED]@shabra.com>
Sent: Thursday 24 November 2022 11:49
To: SingleUse
Subject: Shabra Eco Cup Submission - Ref Regulations for Environmental Levy on Single-use Disposable Cup
Attachments: Shabra ECO Cup Consultation.docx
Importance: High

Dear [REDACTED]

Please find attached our submission from Shabra Eco Cups in relation to consultation process on draft regulations for environmental levy on single -use disposable cups.

Please kindly acknowledge receipt of the same.

Yours sincerely.

Regards,

[REDACTED]
CEO
Shabra Eco Cup Ltd

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Submission to Public Consultation on Draft Regulations for environmental levy on single-use disposable cups

Shabra Eco Cup is making the following submission through the public consultation to the Department of the Environment, Climate and Communications as they seek views from all stakeholders and interested parties on the draft regulations to introduce an environmental levy on single-use disposable cups for hot beverages. We have read the paper providing an outline of the proposed regulatory framework for the levy. We note that the Department is committed to engaging with all stakeholders in a clear, open and transparent manner and we hope our submission will be considered in the finalisation of the new regulations.

By way of introduction the Shabra ECO-CUP is an off shoot of the Shabra Group based in Castleblayney, Co Monaghan and Ireland's leading recycling facility . [REDACTED], Shabra Group CEO, has grown the Shabra Group into Irelands largest recycler of PET packaging and will repeat that same success for the Shabra ECO-CUP. [REDACTED] is a Fellowship with Athlone institute of Technology (Irelands second woman Fellowship after Irish President Mary McAleese) and an Ernst & Young Entrepreneur of the Year Finalist. [REDACTED] has over 4 decades of expertise in ensuring the sustainable management of business within this sector, in particular contributing to Ireland's Circular Economy. A clear demonstration of [REDACTED] qualification, skills and expertise is Shabra's ability to adapt and innovate within the marketplace as with the example of the introduction of the 2002 plastic bag levy, our core business was redundant, and some expected that Shabra would close – instead, Shabra thrived and have recycled over 150,000 tonnes of plastic bottles to date.

As mentioned Shabra ECO-CUP is a company that has been set up to specifically meet the demands for a totally biodegradable, compostable and recyclable coffee cup that is plastic free to stand beside the proposed new regulations while supplying new and existing clients and customers of Shabra Group with compostable cups/containers.

We note that the Minister may make regulations to set levies on single-use items if he or she is satisfied that a suitable re-usable alternative or a suitable alternative with a lower level of material wastage is, or could be made, readily available". It is our belief that the product developed by Shabra Eco Cup company fits perfectly into an alternative solution to the disposable cup scenario.

The main aim of the Single Use Plastics EU Regulations 2021 which will now become The Circular Economy Act 2022 in Ireland is the reduction of the impact of certain plastic products on the environment, particularly marine litter. Single Use Plastic products are made wholly or partly from plastic and are typically intended to be used just once or for a short period of time before they are thrown away. While the new proposed legislation will reduce the use of single use products it is not the best solution. For example, all major sporting events will continue to use the single use plastic coffee cups as reusable plastic cups will not be allowed into stadia as they could be considered and used as a missile. It is our belief that reusable cups will not be allowed in airports given the security risks involved. This will see millions of these cups still available and with no proper recycling plans for them.

It is particularly important to remember that the proposed regulation is targeting a reduction in the consumption of Single Use Disposable Cups in Ireland. Shifting to a 'preferred' type of Reusable Cup does not address Single Use Disposable Cup use. Furthermore the varying merits of different types of cups are only fully realised where they are disposed of in the appropriate manner for their design. The Shabra Eco Cup group can provide a full life cycle from birth at the Shabra Eco Cup plant to use and then can be returned to Shabra where it is easily recycled.

The objectives of the proposed levy are clear and do not include reducing take-away coffee consumption. Nonetheless, future growth is forecast in the sector, with Bord Bia (2021) highlighting the strength of the retail coffee market following the rebound in consumption following the restrictions imposed by the pandemic. The introduction of the 20 cent levy is unlikely to deter many from continuing to use these cups.

Single Use Disposable Cupss are a common example of single use products that by definition have a short usable life. The types of cups that may be defined as single use disposables are varied, but most often describe paper cups with either a plastic polyethylene (PE) lining, or a compostable, vegetable starch Polylactide (PLA) lining. The PE lined cups have been one of most common types found in coffee shops and beverage retailers.

Their plastic resin lining offers strength, waterproofing and safety. These features are some of the reasons why they have been retained as an industry standard. However, whilst the plastic and paper components of those PE cups are technically recyclable, their close integration presents challenges for recycling facilities to process. As a result, they are not widely recycled. The failure of many compostable SUDCs to make it to composting facilities presents a similar problem.

The biggest problem with these type of cups is that in Ireland they can't be recycled, are not compostable, not Marine degradable and all contain a plastic content of over 5% to 7%.

Products with PLA will **take 100 years to break down**, Products with PE will take **4 times more (400 years)** to degrade. Where As Aqueous dispersion products I degrade on contact with moisture and complete disappear **within approx. 100 days**.

This is where the Shabra Eco Cup is different from what I describe above and is offering a clear solution to the use and disposal of Single Use Cups. The Shabra Eco Aqueous Dispersion Coated Cup is Recyclable, Compostable, Industrially Compostable, Marine degradable and has a plastic content of less 0.05% - basically plastic free. Shabra Eco Cup have noted that in Ireland single use coffee cups display many symbols but do they really mean what they say.

Despite displaying convincing logos many questions can be put such as will the cups compost in the open, would they end up being incinerated generating carbon emissions, possibly enter the water ways or end up in landfill sites. Can it be recycled and turned back to recycled paper. Since we are not sure where it would end up we need a cup that is 100% home compostable, 100% Industrial compostable, 100% recyclable and 100% marine safe.

Shabra Eco Cups are Biodegradable, Compostable, Recyclable, Microwavable and Plastic Free and will be manufactured in Ireland in the very near future.

Under the Directive, Ireland must adopt measures at a national level to achieve a reduction in the consumption of single use plastics or provide reusable alternatives at the point of sale to consumers. The Shabra Eco Cup provides an alternative and based on its plastic free element should be exempt from the proposed levy

In this public consultation, the Department of the Environment, Climate and Communications seeks views from all stakeholders and interested parties on the draft regulations to introduce an environmental levy on single-use disposable cups for hot beverages. The Primary Legislation provides an outline of the proposed regulatory framework for the levy but consideration must be given to viable alternatives that are environmental friendly and come within the scope of the circular economy .

Educating the people on the correct way to dispose of the Single Use Disposable Cup such as the Shabra Eco Cup and highlighting the benefits to the environment is part of the marketing strategy of the group.

I am now asking that consideration be given to including the following in the proposed legislation.

“That Single Use Disposable Cups that are manufactured to the following specifications and can produce the necessary certification be exempted from the legislation. Single Use Disposable Cups’ that are 100% home compostable, 100% Industrial compostable, 100% recyclable, 100% marine safe, Biodegradable, Compostable, Microwavable and Plastic Free”.

The CEO and Directors of Shabra Eco Cup are open to meet with Minister of State with responsibility for Communications and Circular Economy, Mr Ossian Smyth to discuss the benefit of the Shabra Eco Cup will have on the environment while making a huge difference to the green economy.

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CEO, Shabra Eco Cup