

Single Use

From: [REDACTED]@cre.ie>
Sent: Tuesday 22 November 2022 15:27
To: SingleUse
Subject: Submission
Attachments: Final Submission Levy Single Use Disposable Cups.pdf

Dear Sir/ Madam,

Please find attached a submission.

Kind regards

[REDACTED]

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Submission to the

Department of Environment, Climate and Communications

On

Circular Economy (Environmental Levy) (Single-Use Cup) Regulations

From:

**Cré – Composting and Anaerobic Digestion
Association of Ireland CLG**

November 22nd, 2022

Introduction

Cré welcomes the opportunity to respond to the Department of the Environment, Climate and Communications' consultation on the draft regulations to introduce an environmental levy on single-use disposable cups for hot beverages.

As a general principle, Cré agrees that minimising waste at source, be it food, garden or other wastes such as single-use hot cups which is the subject here, to be the most favourable option. Indeed, one of the principles of the so-called circular economy is that waste is designed out. This is the clear intention of the Single Use Plastics Directive and Circular Economy Action Plan.

Whilst reduction is one aspect of a circular economy, it is also to consider two other areas, firstly are the replacement goods and services in the form of reusables better for the Irish circular economy and secondly where goods and services are not fully replaced, are those remaining able to play a role in local circularity through recycling and or composting.

Local Manufacturing, offshoring impacts

To the best of Cré's knowledge, Ireland does not have a reusable on the go style cup manufacturing industry. As a result, such cups will be imported. It is presumed that, as with much of this sector, including the single use component, these imports will arrive from the Far East. As we understand it, production and manufacturing in the Far East is not subject to the carbon taxes or environmental standards as applied in Europe. So, without incentives for local manufacturing in these areas, the simplest outcome will be an off shoring of carbon emissions and lower environmental standards. It is also worth noting, that the vast majority of reusable cups on the market are in no way recyclable within existing or foreseeable infrastructure. Therefore, unless such cups become heirlooms and are passed from generation to generation, without significant intervention in design, there is the likely prospect that, just like the move to reusable plastic carrier bags, the well intentioned policy will, unintendedly, drive waste generation and resource consumption.

For those single use cups which will continue to be consumed in Ireland and should this levy move forward, it is essential that steps are taken to ensure that they are manufactured with materials which result in products which can be recycled or composted. For a circular economy to bestow the most benefit on society it is essential that the circles are as small as local, in other words, local production using local primary and secondary resources. Similar to the situation with reusable cups outlined above, whilst Ireland does have significant bioresources e.g., forestry, it does not have a paper board industry. At the other end of the circle, nor does it have any capacity for single use hot cup recycling. However, what Ireland does have is world leading cup manufacturing, extensive organic recycling e.g., composting infrastructure and legislation soon to be requiring all households to have separate collection for organic waste as well as regulations governing business waste and the separation of organic waste.

Bioeconomy Action Plan

Ireland has long known the benefits of a thriving bioeconomy and is in the process of developing its second bioeconomy action plan. Organic waste, organic recycling, high quality composts and digestates as well as fibres and manufacturing are all central to the bioeconomy. The proposals laid

out below are done so in the context of enabling manufacturing and circularity within the Irish bioeconomy.

Cré Compostable Certification Scheme

In 2019, Cré CLG established a wholly owned subsidiary Cré Certification Ireland DAC to provide certification services for the Cré Compostable Certification Scheme.



The Cré scheme involves products certified to European Standards and then tests the products in a typical Irish composting plant to ensure the products compost under Irish conditions. The product then gets awarded a Certification enabling use of the specific Cré logo so that the product can be placed in any food waste bin.

Compostable Packaging looks similar to other packaging, and this is where the problem lies. People do get confused and put it in the wrong bin. By having this unique Cré logo, it educates the public that the product is compostable and tells the public to put the product in the food waste bin.

Benefits of the Cré scheme:

- It gives confidence to packaging companies and composters that the product is compostable in Ireland.
- It gives confidence to suppliers that their products will be accepted at Irish composting plants.
- It provides a clear message to the public into which bin compostable products are to be put.
- It reduces contamination levels so that the compost is marketable.

On-the-go Collection Points for Food Waste

Infrastructure needs to be provided to give choice to consumers, three bins in food outlets, offices and on street should be provided. On-the-go collection points for food waste and compostable products are beginning to be seen in Ireland such as in Dublin International Airport (see picture). We applaud such initiatives, but they will only be successful if the cups and other food service ware which they are designed to collect are compostable, if not, they will only attract more non-compostable and biodegradable wastes. This must be both instore and on street.



Recycling and composting of coffee cups

In the absence of any bespoke hot cup collection system, single use hot cups which are placed in recycling bins will be sent overseas to a general paper recycling facility. These facilities will generally accept cups and due to their processes have no concerns over whether the lining of the cup is polyethylene or compostable. On the contrary, where polyethylene lined cups are sent to organic recycling facilities, they are considered contamination due to their persistent plastic content.

A simple solution

In order to simplify the message to consumers, manufacturers, the waste industry and food service industries, Government should require that all single use hot cups, as well as lids and other associated sundries, which are placed on the market are compatible with Irish organic recycling facilities. Making this waste stream uniform, in combination with driving reuse through the application of a levy, will be one small step in the journey towards circularity.

Funding

Currently, there is no position from Government on how the funds generated by this levy will be distributed via the new Circular Economy Fund. Cré would welcome the opportunity to discuss options on this with the Government. However, the packaging industry is today, via REPAK, investing significant resources through the PRO scheme into waste education and recycling. That said, to the best of our knowledge and despite the long presence of compostables in the market and requests from Cré, REPAK has yet to distribute financial support to the system necessary for the capture and organic recycling of compostables including compostable, single use hot cups. We therefore request government to instruct REPAK to undertake the necessary steps to distribute the PRO income it receives from compostables into supporting the compostables and organic recycling sector.

No system is perfect

As outlined in the RIA, moving to a different material, e.g., compostable as we propose, is not the perfect solution, therefore nothing should be done in this respect. We argue however, no solution is perfect, unfortunately there will always be misthrows into the wrong bin or even more regrettably litter. Yet by restricting this product to a multi-end of life recovery system i.e., composting and material recycling, which is only possible through compostables, this is a significantly better scenario than today. Government therefore has a choice with what to do with those cups which are still in the market post-levy, either enable a more circular system or reject innovation and maintain the status quo.