



## **Additional Submission from Conscious Cup Campaign for Circular Economy Waste Action Plan**

### **Certification and Labelling**

Consumers want to make the right choices but feel very confused as there is inconsistency in labelling and definitions. We are seeing increasing levels of “Greenwash” as consumers seek out sustainable choices. Equally, producers are often confused by the mixed messages and often invest in artwork, packaging and new machinery to only discover that with the best will, they haven’t improved the situation.

As a solution to this “Confusion”, the Competition and Consumer Protection Commission (CCPC) could have added responsibility to protect the Consumer from misleading advertising and labelling. Perhaps the My Waste website should expand to include a database of certification, one aimed at Consumers and another aimed at Commercial Enterprises.

In addition to including certification details within the website, perhaps it would be worth also including certification for “Reusable”. This would encourage producers to seek certification to avoid EPR.

### **Barrier to Reuse**

The Food Safety Authority Ireland modified its website the very day that the Government announced the proposed single use cup levy consultation. Here is a link to the [FSAI on Reuse](#) that day. While it is important to protect business and the consumer with food hygiene, it is equally important to support them on the road to Reuse. France, Italy and many other countries have moved forward along with many UK Supermarkets who accept consumer's containers. Here is an example of [Spar Slovenia](#) accept customer’s reusables and promoting it on their website. The Scottish policy on food standards and reuse of containers is at the bottom of [this page](#), interesting that this post is from March '19 and Scotland also have a Latte levy in the midst but the language used here is more positive than the FSAI.

Would it be possible for DCCAE to collaborate with the FSAI? It would be worth exploring how we can rewrite the policy with “how to implement reuse” that protects business but also enables Ireland to meet its targets to reduce single use plastics and the possible financial penalties we may face for not doing so.

## Single Use..an instant way to Reduction through Policy and Support

We know Single Use bans would be an ideal but the infrastructure and awareness to support such a system is paramount. If we really want a ban and effectively reduce certain items then it requires a strategic approach, it is always about “how” we can get there and bringing everyone along. One way could be to:

1. Prevent waste *where it is produced in volumes*
2. Change *behaviour at scale and subsequently changing attitudes* to waste prevention so that it forms part of our culture.

Points 1 & 2 above could easily be applied with a ban on single use (plastic and bioplastics) to these “closed loop” type settings:

Sports Stadiums	Educational facilities
Music Arena’s	Public Libraries
Zoos	Festivals
OPW Sites	

Many other countries are managing to facilitate bans in these settings with deposit return schemes for cups. The benefits are huge both in terms of resource efficiency and behaviour change. **To make it work**, the system requires investment in cleaning facilities/machinery but it can be done and there are a number of companies offering this type of machinery that can clean up to 5,000 cups per hour. [Green Goblet](#), based in the UK, currently offer this service to festivals and the like, however they are not expanding into Ireland.

To the best of my knowledge, none of these machines are currently operating in Ireland due to the expense for one company to purchase. However, there are solutions to this in terms of perhaps subsidising a company to set up this service through EPR funds/Local authorities etc and it runs as a social enterprise. This could offer the possibility to remove all single use cups including Coffee, Soft Drinks and Beer etc. Machinery can also be made to suit other types of packaging including containers.

This project could very well have the effect of changing behaviours at scale and eliminating single use at the same time.

It is also a very easy way to capture metrics and figures which is required for various products.

### **The impending single use cup levy**

One point is that, I would still encourage the discount for reusable cups be offered even if the levy comes in. For example the coffee is priced at €3.25 for sit in ceramic cup, for a disposable, it's €3.50 (inc levy of 25c of more) but for Reusable its €3.25-25 cent ie €3

This means the consumer has the perception they have the potential to save 50 cent, it also encourages the Cafe to push Reuse and gain more loyal customers.