Denis Dunne

From:

Donal Hourigan

Sent:

21 February 2020 10:23

To:

'Dermot@abgrouppackaging.com'

Cc: Subject: Denis Dunne; Kevin ODonoghue; Niamh NiFhlaithbheartaigh Re current review of plastic products and plastic bag for life bags

Dear Dermot

Thank you for your email below which has been passed on by Patrick Cluskey. Your comments will be considered in developing a Waste Action Plan for a Circular Economy. The full public consultation is available on our website at: https://www.dccae.gov.ie/en-ie/environment/consultations/Pages/Public-Consultation-Waste-Action-Plan-for-a-Circular-Economy.aspx

Any further submissions can be sent to wastecomments@dccae.gov.ie

Regards

Donal

Donal Hourigan, Executive Officer Waste Policy& Resource Efficiency

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From: Dermot [mailto:Dermot@abgrouppackaging.com]

Sent: 29 January 2020 07:06

To: Patrick cluskey

Subject: Re current review of plastic products and plastic bag for life bags

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Good morning Patrick

Please excuse me cold calling you this way, I received your contact details from Jennifer Carroll MacNeill, as the most appropriate person to contact regarding the current review/study into ways of reducing plastics in our country

We are a paper bag manufacturer, originally established in Blessington, Co Wicklow in 1985, we now also operate plants in Wales and Spain and are one of the largest paper carrier bag manufacturers in Europe.

The reason for my mail is to make a submission regarding the current review on single use plastics, particularly the rise in use of the plastic bag for life, which today is used in many cases as a single use plastic bag. As a previous manufacturer of these bags in our Welsh plant, we have some valuable insight that may prove interestIng and help shape a better outcome maximising the volume of plastic being used today.

What I have no idea of, is how we should make this submission and was hoping you might be able to steer me in the right path.

In essence these are our main points

- no plastic bag for life product is made in Ireland, with the vast majority coming from Asia
- Dunnes increased the cost of their plastic bag for life several years ago, from c.10cents each to 70cents, shortly after doing this, all major Irish supermarkets followed suit Tesco, SuperValu, londis etc
- number of sales of plastic bag for life has continued increased , as has happened in N.Ireland , Wales , Scotland and England $\,$
- the most important point to take from this is , if your shopping and forget to bring a bag , a consumer generally has no option but to buy a bag regardless of price.
- this point can now also be seen working in the UK supermarkets , where Morrison Supermarket has recently tripled the cost of their Plastic bag for life from 10p to 30p, Sainsbury's and Tesco Uk and M&S similarly
- we can also confirm that when Morrison introduced our RePapaPac a truly reusable paper bag for 20pence while the plastic bag for life was selling at 15pence, the plastic bag retained 75% of the bag business. When Morrison's increased the price of our RePapaPac bag to 25p and plastic bag for life for 30pence. Our paper bag took 60-65% of the business. We are expecting Morrison's to crease selling all plastic bag for life product shortly
- in a normal competitive market the cheaper option will receive the largest shire of the market
- however in Ireland, our RePapaPac is not being discussed by any supermarket, as an option, due to the large profit being made on selling the Plastic bag for life bags
- we manufactured Asda's plastic bag for life, in the UK 6 years ago for 6pence)
- because there is no levy currently applied in the UK to plastic bag for life products, they are selling between 15-30p today (interestingly Tesco Ireland price is 70cents while in the UK the exact same bag is selling for 15p)
- our RePapaPac is selling to the consumer for 20-25pence, substituting plastic bags imported
- as I write to you I eland Foods in the UK have just pulled all plastic bags for sale and now only offer our RePapaPac at a discounted price to what we charge them of 15p
- from our research and quotes to supply most Irish supermarkets we estimate the Irish plastic bag for life market to be worth c.110million bags
- we would estimate the weight of these bags to be approx 800tons
- as there is virtually no plastic reprocessing facilities, only collection depots and sorting points such as Panda Waste, at an overall rates of approx 11%. It means approx 80tons are re-exported generally back to Asia
- while approx 720tons ends up either in landfill or the oceans.
- if the final decision is to amend the levy to include a levy of plastic bag for life products, our opinion is wether the supermarkets decide to absorb the 25p of just add to the 70c and because the plastic bag still gives the most profit plastic bag for life products will still Be the preferred bag to offer and RePpapaPac might take approx 10% of the market
- another worrying trend is the introduction of 'compostable' bags . Unbelievably SuperValu make a claim that "I am not a plastic bag' . Very simply these so called compostable bags are generally made using potato starch but as everyone knows , potatoes when pulped and made into a sheet of 'film' SuperValu have now appeared to successfully got potatoes or sugar cane to seal to itself !! their statement is not correct their bags contain plasticisers as a binding agent , this is what allows the film used in their bags to heat seal and allow the film become a bag

- in reality the plastics industry are hijacking the word 'compostable' and ' 'degradable' to greenwash their plastic
- we are working with PEFC/FSC to try come up with an Ocean certification mark. In our opinion, the bar to be reached in terms of what Products are acceptable and which are not, is to ask a simply question -

If an organic organism eats the product, can it digest it or not?

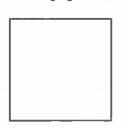
I would challenge Musgraves to prove that of their compostable bag. This is also one of the reasons we do t see paper bags in any volume in the oceans

I hope that this mail can help and would be delighted to discuss any matter if needed, many thanks for your time

Kind regards
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