

Irish Government Waste Action Plan for a Circular Economy Consultation

Nestlé Ireland Submission

February 2020

Introduction

Nestlé Ireland welcomes the opportunity to respond to this consultation as we recognise that waste and environmental damage are huge concerns for the planet.

As part of the world's biggest food and drink company we commend the transition towards a circular economy that moves away from the traditional "take-make-waste" model to one that designs waste and pollution out of the system and gradually uncouples economic activity from the consumption of finite resources.

We recognise that as a major food and drink producer we have a role to play in stimulating and encouraging the transition towards a circular economy. Our position brings both a responsibility to our consumers and the planet, and an opportunity to make an impact through our policies, processes and products.

However, we also appreciate that transforming the system isn't something we can do alone and that the transition to a truly circular economy requires collective action. As such we are working across the food and drink industry, and with both national and international partners, to create lasting and impactful change.

We commend the scope and ambition of the Irish Government in its policy proposals and have chosen to address the areas included in this consultation document with most relevance to our operations: plastic, single use plastic and packaging waste; food waste; Extended Producer Responsibility (EPR) and food waste.

We believe that for any policy in this area to succeed it should take a holistic approach, looking across the whole system as a harmonised approach will ensure it is easier for businesses to meet the requirements placed upon them.

Plastic, single-use plastic and packaging waste

The consultation document sets a target of increasing the amount of plastic packaging that is recycled in Ireland from 34% (2017) to 55% by 2030, while acknowledging that we must go above and beyond this, and Nestlé commends this ambitious approach.

As a major food and drink manufacturer we recognise the impact of plastic and packaging waste. Tackling plastic pollution, especially in our oceans, is an urgent priority for us and is a responsibility that we take very seriously. We support all efforts to raise awareness and find solutions to the plastic waste problem and have been working with governments, NGOs, suppliers, waste managers, retailers as well as other companies to take meaningful actions.

In Ireland we have been members of REPAK for a number of years and are signatories of Ireland's Pledge on Plastic Waste¹, and in the UK for example we were a founding member of the UK Plastics Pact, both of which work towards eliminating problem plastics and tackling plastic waste.

In 2018 we committed to ensuring that 100% of our packaging is recyclable or reusable by 2025. With a portfolio of products that reaches across a wide range of categories – from confectionery and coffee to pet food and cereals - we know that there is not one single answer to meeting this aim, and in order to solve this challenge we recognise that we must go above and beyond ambitious commitments and focus on action.

Our approach to creating a more sustainable and circular system focuses on three core areas of work, and we would be happy to share further information on our national or international activities with the Irish Government:

1. Create the packaging of the future

We recognise that, in some cases, ensuring our packaging is recyclable or reusable will mean using solutions that we do not yet have. As highlighted in Section 18 research and innovation is key to developing these, and in driving progress towards our 2025 goal we have announced a number of research initiatives.

In 2019 we launched the Nestlé Institute of Packaging Sciences, the first of its kind in the food industry. Our dedicated global research facility will help accelerate our work introducing functional, safe and environmentally friendly packaging solutions and address the global challenge of plastic packaging waste.

To further stimulate this, in January 2020 we announced an investment of CHF 2 billion (€1.8bn) to lead the shift from virgin plastics and stimulate the food-grade recycled plastics market². This includes a sustainable packaging venture fund that will invest in start-ups focused on packaging innovation, including new materials, refill systems and recycling solutions.

Eliminating problematic or unnecessary plastics and simplifying the packaging materials that we currently use are two other key steps in meeting our aim. In working towards this we have introduced a "Negative List" for hard to recycle plastics and a timetable to phase out their use across all our packaging.

We are also exploring alternative packaging materials for our products, and we are proud to have launched the confectionery industry's first recyclable paper packaging for our YES! snack bar range in July 2019³.

¹ [Ireland's Pledge on Plastic Packaging Waste](#)

² [Nestlé creates market for food-grade recycled plastics, launches fund to boost packaging innovation](#) (16 January 2020)

³ [Nestlé launches YES! snack bars in recyclable paper wrapper](#) (2 July 2019)

2. Help to shape a waste-free future

The consultation highlights that almost two-thirds of plastic packaging in Ireland is not on the current recycling list, and we agree that this is an area with scope to improve performance. As a producer working to shape a waste-free future our role is twofold: ensuring our packaging is designed “recycle ready” while encouraging the development of infrastructure at a national level to ensure that these products can be recycled. We would encourage the Irish Government to engage with businesses, either directly or through REPAK, to ensure they understand the feasibility of introducing alternative packaging materials and encourage joined up thinking when developing infrastructure.

We are determined to reduce our use of single-use plastics, and in working towards this we are currently working in collaboration across several categories to introduce alternative delivery systems. These reimagine the way products are distributed to and stored by consumers, encouraging them to return containers to retailers for reuse rather than throwing them away, keeping them in circulation for longer and encouraging circularity while reducing our reliance on single use items.

As an organisation that operates in a number of countries with Deposit and Return Schemes (DRS) in place, we support the introduction of a well-designed similar scheme in Ireland.

3. Drive new behaviour and understanding

Driving new behaviour and understanding is another key element of our approach, ensuring our own employees are aware of our targets and engaged in working towards them.

Our Irish sites are among 4,200 factories worldwide that have stepped up to the challenge of removing single-use plastic items that are difficult to recycle and replacing them with reusable materials. We have phased out sauce sachets, plastic stirrers, straws, plastic cutlery and plastic cups, and within the first six months prevented 1.5 million single-use plastic items from being sent to landfill.

Each year, Nestlé employees use hundreds of volunteering days in their communities helping to clean up their local areas, including a team from our Dublin site who spent a day removing plastic on the Bray coastline.

The consultation asks whether there are additional measures that could be introduced to reduce the amount of single use food containers used in Ireland. One mechanism that could be explored is charging for these items, which is something that we agree with in principle. However, collaboration with industry is vital to ensure that the Irish Government has a thorough understanding of the feasibility and timings of finding alternative packaging solutions ahead of the introduction of any additional charging.

Whilst we support the proposed increases for recycled content in packaging, it is important to highlight the challenges that exist in food-grade recycled plastic for food manufacturers.

We have significant concerns that the food and drink manufacturing sector stands to be seriously disadvantaged given that currently there are only limited opportunities to incorporate recycled content into food grade plastic, due to existing regulatory restrictions on food contact materials. Plastics in Contact with Food EC 282/2008 currently stops the use of recycled content in food packaging apart from PET and HDPE for milk bottles only. Therefore, as a food manufacturer we are currently limited on what recycled content we can add into our packaging today.

Absence of collections of some formats e.g. consumer films which will not be rectified until consistent collection of all plastics is implemented. This affects 17% of all plastic packaging as per the WRAP Plastic Flow 2025. At present there is a severe shortage in capacity to meet these needs and as a

result certain stakeholders are already experiencing an inability to meet higher recycled content levels.

In addition to this, there are some products where it is currently difficult to increase the level of recycled content due to how the packaging or product will be used. For example, with pet food pouches the food is cooked in the pouch and therefore the materials used within the packaging materials need to be able to withstand the product being cooked at high temperatures – for health and safety reasons. Thus, certain types of existing recycled content are not suitable for use within the packaging.

As previously highlighted, we are committed to reducing our reliance on single use plastic however as we deploy new solutions safety is paramount and we will never compromise the health of our consumers.

Food waste

As a major manufacturer we recognise the impact of food waste and are committed to minimising/eliminating food waste in our supply chain and enabling the industry to deliver Goal 12.3 of the UN Sustainable Development Goals. With around 30% of available agriculture land used to grow food that is wasted, and the huge carbon footprint that comes with this, measures need to be adopted to mitigate its impact on the planet as part of building a circular economy.

As an organisation, we have been working to reduce food waste for more than a decade, and in 2015 achieved zero waste for disposal (including food waste) across our entire UK and Irish operation including our infant formula manufacturing operation in Askeaton, Co Limerick, while our global ambition is to halve food waste by 2030. Last year we began publishing our UK and Ireland food waste and food surplus figures, and we are proud to have reduced our food waste levels by 8.6% since 2016 using the 'Target, Measure, Act' principles and resources of the Food Waste Reduction Roadmap. Mandatory food waste reporting for businesses is one measure that we would support to increase transparency and tackle food waste in supply chains. and have introduced food waste bins in all our sites.

One measure Nestlé Ireland uses to reduce its food waste is redistribution and in 2018 we announced a new partnership with social enterprise FoodCloud Hubs⁴. In addition to providing all of our surplus stock to them, we are the first manufacturer in Ireland to make a per-pallet financial contribution to manage, store and redistribute our surplus stock which creates a new sustainable income stream for the organisation.

In principle we are supportive of the introduction of a voluntary target for a percentage of edible food to be donated/redistributed. However, in recent years Nestlé has invested significantly throughout our value/supply chain to reduce waste. While the overall waste reduction is to be welcomed, ensuring there is less waste produced throughout our supply chain has resulted in a lower amount of end product for redistribution/food surplus. As such it will be important to ensure that any targets introduced do not have unintended consequences.

EPR

Nestlé supports the introduction of Extended Producer Responsibility (EPR) schemes, ideally owned and operated by industry, as a key driver in helping us achieve our 2025 commitment, and agree that it can act as a major policy tool for accelerating the Circular Economy..

When introducing EPRs, we believe that their regulatory outcomes should meet the following general principles:

- Allow producers to secure material for closed loop recycling/circular economy

⁴ [Nestlé Ireland becomes first food supplier to pay for FoodCloud Hubs service](#) (4 October 2018)

- Shared responsibility across the value chain
- Be efficient, cost-effective and accountable
- Ensure harmonisation of relevant legal frameworks
- Have strong environmental outcomes
- Be convenient for consumers
- Ensure long-term financial sustainability (e.g. re-investment back into the system for continuous improvement)
- Ensure the informal sector, where present, is considered (i.e. fair and inclusive schemes on improving livelihoods)

Citizen engagement

As highlighted in Section 8 of the consultation document, citizen engagement, awareness and education are key to working towards a circular economy, and as an organisation we run programmes to inform and engage consumers about managing their waste sustainably. We would encourage the Irish Government to look at citizen engagement programmes carried out in the Netherlands and Germany for examples of best practice. Consistency of information and harmonisation of collections are other key elements to consider.

Within the Citizen Engagement section there is considerable focus on household and business waste and ensuring that consumers sort their waste into the correct bins, with less emphasis on “on the go” and out of home behaviour. Our research indicates that as consumers adopt a more on the go lifestyle, this is another area where consumer behaviour can be influenced and would encourage the development of further policies aimed at out of home.