

Tesco Ireland Submission to the Department of Communications, Climate Action and Environment Public Consultation on a Waste Action Plan for a Circular Economy

Note: The content of this document is also relevant to the Department of Communications, Climate Action and Environment Public Consultation on the Transposition of the Circular Economy Waste Package

21st February 2020

Introduction

Tesco Ireland welcomes the opportunity to respond to this consultation on a *Waste Action Plan for a Circular Economy* and to share our perspective in relation to the development of national waste policy, as it pertains in particular to the reduction of food waste and packaging waste.

We were pleased to attend the high-level consultative forum on Ireland's Future Waste Policy and the Circular Economy in September last year and will expand on our contribution to that forum in this submission. We welcome that the Department is engaging with the business sector in this manner, in that future waste policy will result in and require changes in our business operations. We are available to discuss any aspect of this submission and to expand on, or clarify, any points as required.

As this document may contain commercially-sensitive information, we would request should it be published, that we are provided with advance notification and the opportunity to identify/redact any such information.

About Tesco Ireland

Tesco Ireland is one of Ireland's largest private sector employers, with over 13,000 colleagues based in our head office, distribution centre and 151 stores in towns and cities nationwide. We are conscious of our role in protecting the environment, and helping to support the delivery of related policies, and we are working hard to make and influence change where we can.

Being a sustainable business is very important to us. We are members of Repak and have received the Business in the Community (BITC) *Business Working Responsibly Mark* in recognition of our sustainability commitments. We are also proud signatories of the Business in the Community *Low Carbon Pledge* to halve our carbon footprint by 2030 and of Repak's *Plastics Pledge*. Our policies are aligned to the United Nations Sustainable Development Goals, as well as European and national frameworks.

In that context, we have set challenging targets and are taking action to deliver a step-change in how much plastic waste is generated in our business, as well as leading the way in tackling food waste. Our approach to waste is based on doing the right thing to deliver real impact, and taking a considered approach to seek to limit unintended consequences.

We know that our colleagues and customers are seeking action, and we are working to deliver change where we can. We would suggest in that regard that it is of particular importance, that any future policy or legislative developments are based on evidence to deliver environmental benefit and, furthermore, that the practical and cost implications, are fully considered.

We therefore welcome the opportunity to respond to this consultation paper and look forward to sharing our views on and supporting the delivery national policy in this area in the future, as appropriate.

Overview

For the purposes of this submission, we have largely concentrated on those areas which most impact our business, and where we believe we can have the most influence - namely food waste, plastic and packaging waste and single-use plastics. In this response, we share our experience in relation to a number of these areas, in which we are making significant progress, and highlight what we believe are both opportunities and challenges in this regard.

Response to Consultation Questions

Section 4.7 Consultation Questions – Food Waste

- *What are the underlying causes of food waste in Ireland?*
- *Should Ireland introduce a national prevention target in advance of a possible EU target?*
- *How can Ireland become a 'farm to fork' global leader in food waste reduction?*
- *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?*

Tesco Ireland Response:

Tackling food waste is something we are passionate about at Tesco Ireland. We were the first retailer in Ireland to launch a national surplus food donations programme with FoodCloud in 2014 and are the only retailer to fully measure and publicly publish our food waste statistics annually.

We are also pleased to participate in the Government's Action Group on Food Waste and - having already signed the Food Waste Charter - we welcome the proposal to increase the number of signatories to one hundred this year. Indeed, we have supported a number of food businesses with their food waste strategy and processes, in that twelve of our major own-label fresh suppliers have pledged to substantially cut food waste - and publish data on this regularly – in line with United Nations Sustainable Development Goal 12.3.

We also welcome the proposal for EPA-commissioned research on the carbon impact of food waste. Our view is that further research in this area would be beneficial in terms of future policy development, and we have started to assist and share knowledge, as appropriate. For information, our own work on food redistribution with FoodCloud has led to a saving of 12 million kilograms of carbon emissions from being produced through the transport and processing of this food as waste; equivalent to the CO₂ emissions from the consumption of over 5.4 million litres of petrol.

We are broadly in favour of food waste reduction targets - our work to date has led to the redirection from waste of the equivalent of 10 million meals. However, success for us in this area will be in the overall reduction of our food waste, and we are working to implement Sustainable Development Goal 12.3 across our business. We believe it is important that the approach to implementation of food waste policy is carefully considered in order to be effective in the Irish market - we believe any food waste targets should be incentivised to encourage greater adherence to and adoption of the food waste hierarchy with priority given to donation to humans in the first instance. It is important to note on this point, that the charitable food sector in Ireland is not as established as in the United Kingdom or some other European countries and as a result, there is a limited existing capacity to take food donations.

We would also welcome the opportunity to discuss additional outlets for food surplus management where possible, in line with the food waste hierarchy, namely animal feed which is currently an option in the United Kingdom and many other European countries. We are of course cognisant of the challenges to ensuring that animal by-product does not find its way into the animal food chain, but would welcome discussions to see if there's an opportunity for suitable bakery or fruit/veg items to be redirected in this manner.

In terms of engaging consumers, we agree with the Department and with stakeholders such as the Environmental Protection Agency that consumer awareness is one of the key drivers of reducing the amount of food waste produced both in homes and business. As such, we would be pleased to support the proposed awareness campaign on best before/use-by dates. We would suggest this would be best led by the EPA/Stop Food Waste as coordinator of the programme, which could be subsequently supported by retail in terms of implementation.

Within the Tesco business, we have removed best before dates where it makes most sense within the store environment, for example in some fresh products such as some hard fruits and vegetables. It is important to note that any best-before/use-by date removal must be in line with health and safety requirements and that the technical elements are thought through from the beginning, to avoid any food safety risk. We would be pleased to share our views on this as our technical teams have in-depth knowledge of this issue in terms of practical implementation the store environment, which could complement that of the EPA and other officials.

As a further general point, we would suggest in any future policy developments that existing legal and regulatory requirements already pertaining the retail sector are taken into account – for example, retailers have strict insurance requirements and health and safety standards with which to abide, and it is important that these are taken into consideration as other food waste policies are developed.

Section 5 – Plastic and Packaging Waste; Section 6 – Single Use Plastic and Section 11 – Waste Management Infrastructure

Tesco Ireland Response

The following responds to the above three key sections of the consultation document, as there is some overlap between the topics.

At Tesco Ireland we are working towards a closed-loop approach, and our packaging strategy is based on the 4Rs - *Remove, Reduce, Reuse and Recycle*. We aim to remove non-recyclable and excess packaging from our business by 2025.

We have set our own challenging targets and are taking action to deliver a step-change in how much waste we generate. We will:

- Remove of all hard to recycle materials from our own-label packaging by the end of 2019
- Halve the weight of our own label packaging and ensuring it is fully recyclable by 2025.
- Ensure that all board and paper used in our own label packaging is 100% sustainably sourced by 2025.

In terms of specific actions to reach these targets, we have recently introduced detectable black packaging on own-label fresh meat, cooked meats and chilled ready meals, which will make 448 tonnes of plastic now recyclable.

More recently, we announced that we will become the first retailer in Ireland to remove plastic-wrapped tinned multipacks from our 151 stores and online. This measure was first piloted at our Bar Hill¹ concept store in the United Kingdom and its rollout across Ireland will see 1.5 million multipacks sold without plastic wrap each year. Furthermore, we have turned off automatic till receipts on our self-scans, which has the potential to help us save 36 tonnes of paper annually.

In Section 5, the consultation notes that, *‘retailers will explore how excessive packaging can be avoided’*. In that regard, our approach is such that, as well as making changes within our own business, we are working to influence change where we can along our supply chain.

To that end, we are working with our suppliers to support them in terms of developing more innovative packaging solutions, and to reduce unnecessary packaging. Our technical teams work closely with suppliers to identify materials which we no longer wish to use in our business and this list is regularly reviewed. We are open to sharing knowledge in this regard with the Department as part of the National Waste Strategy development, as appropriate.

Regarding the measure mentioned in Section 5 to *‘monitor Repak’s ‘success in delivering on the ambition of their plastic strategy for their membership’*, we are members of Repak, are signatories of their Plastics Pledge, and are pleased to work with them and other industry partners, to deliver on this strategy. We will continue to explore new opportunities to reduce and reuse packaging and ensure any remaining packaging is recycled as part of a closed loop system to support the wider circular economy.

With regards to the proposal on the use of economic incentives to encourage reuse, we believe that, while fiscal measures can be an effective method of supporting public policy aims, their application must be carefully assessed. Any levies must be fair and designed to incentivise moves towards widely recyclable

¹ As we investigate the optimal methods to reduce plastic packaging across the Tesco business, we are testing new ideas to Remove, Reduce, Reuse and Recycle in our Bar Hill store in the UK.

materials. The administrative burden on retail operations must be taken into account in any levy application, as well as the impact on the consumer. We also believe that it is important that levies are not placed on products that are already considered alternatives to plastic –rather that infrastructure needs to be put in place to deal with this kind of waste. For example, as it stands, we believe that compostable containers can be confusing for customers because the infrastructure is not in place to deal with them.

In relation to the following ambitions,

- *We will assess the recommendations of the national report commissioned to establish how best to achieve a separate collection rate of 90% for plastic bottles, including consideration of a deposit and return scheme.*
- *We will achieve a separate collection rate for PET plastic bottles of 77% by 2025.*
- *We will achieve a separate collection rate for all plastic bottles of 90% by 2029.*

our views are as follows:

In this context, we note the potential consideration of a deposit and return scheme as a means to increase recycling of plastic bottles and note that it could have a role in improving recovery of plastics, however we don't believe that it would provide a complete solution.

We currently have glass bottle banks in 60 stores (in which we have Tesco-owned car parks), which is useful for consumers, given that glass is not widely recycled in household waste collections. However, as plastic bottles can currently be recycled in the household dry recycling bin, we would question the merit of DRS as a means of incentivising customers to recycle these 'in-home' products and would suggest that focus would be best directed towards developing recycling options for 'on-the-go' convenience products. We understand that the Department has conducted a desk-top study to address the merits of a DRS system, and we look forward to receiving further information on same.

While we note the overall ambitions of a collection system, and are keen to support the delivery of Government's Climate Action Plan and upcoming National Waste Policy, we would stress the importance of considering all of the implications of such a scheme, in terms of practicality, space, cost and maintenance in particular. We would welcome the opportunity to discuss these issues in further detail with the Department if possible and would note that as a business operating across the UK and Ireland, it is important that any proposed schemes, should they be introduced, are aligned insofar as possible across these jurisdictions.

In relation to the following questions contained in Sections 6 and 11,

- *Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use re-useable ware?*
- *Do retailers have a role to play in exploring viable reusable food containers for on the go consumption?*
- *Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?*

single use plastic packaging is an issue which we, our suppliers, and our customers are concerned about. While we have identified methods to reduce our plastic consumption within our supply chain and continue to strive to innovate in this regard, it is important to note that 'soft plastic' currently cannot be recycled within the current waste infrastructure.

Plastic packaging can play an important role in terms of food handling, food safety and food transport and will continue to play a role in the future. We would therefore urge Government to consider widening the scope of existing waste infrastructure in Ireland, to enable the processing of soft plastics, in that there are some plastics for which it is challenging to identify alternatives. We would also suggest that 'on-the-go' recycling options need to be improved so that, while producers and retailers work on alternatives to plastic on-the-go containers, current waste can be correctly recycled.

Tesco Ireland is working with Repak on its Plastic Packaging Recycling Strategy 2018-2030, which covers a trial on household flexible plastics/films back in recycling bins. We are also contributing to Repak discussions on education around waste, and work on pack recycling logos, which we believe will be beneficial in this regard.

In terms of supporting customers to bring their own containers, this is something that would need to be carefully considered and scoped, with meaningful industry engagement and planning, should it be introduced. As well as questions around logistics, we would have some concerns around health and safety aspects also.

Section 8 - Citizen Engagement Awareness Education

As previously mentioned, we believe that consumer education is one of the key ways we can reduce waste in both homes and businesses.

In relation to the following measures,

- *Continued development of the MyWaste.ie portal as a national resource to provide more information on all matters waste related, including greater support from the waste industry.*
- *Targets to be developed to reduce the contamination levels in specific bins which will inform future awareness campaigns.*
- *Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?*
- *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?*

we agree that targets to reduce contamination levels, and information stickers, potentially reflecting bin colours, could be helpful. However, helping individuals to make the right choices can start with simple, clear and consistent information on packaging, supported by other media. As such, we would appreciate if a guidance document for on-pack recycling information could be developed and provided to retailers – such guidance is not currently available.

Conclusion

Tesco Ireland welcomes the opportunity to respond to this consultation and to share our perspective in relation to the development of relevant areas of national waste policy.

We are available to discuss any aspect of this submission and to expand on, or clarify, any points as required.

For further information:

Grace Milton
Head of Corporate Communications and Government Relations
Tesco Ireland
grace.milton@tesco.com