



21 July 2009

INCPEN response to *Towards Zero Waste* April 2009

INCPEN – the Industry Council for Packaging & the Environment is a research organisation set up in 1974 to study the environmental and social impact of packaging. It draws together an influential group of companies that operate throughout the supply chain and share a common interest in packaging, the environment and sustainable development.

Research includes:

- *PackGuide: a guide to packaging eco-design with Envirowise2008*
- *Produced "Packaging in Perspective" for the UK Government's Advisory Committee on Packaging 2008*
- *Multi-stakeholder initiative in 1999 with consumer and environmental NGOs, and local government to produce an Action Plan on packaging*
- *2-year study of the environmental impact of the UK Food Supply Chain 1996*
- *Study by the UK Centre for Economic and Environmental Development on "over-packaging"*
- *Life cycle analyses since the late 1970s*
- *The first analysis in the UK of the composition of municipal solid waste to identify the packaging fraction in 1980, jointly with Merseyside County Council*
- *Supporting and part-funding the National Household Waste Analysis Programme until it was discontinued in 1992*
- *Providing industry funding for Friends of the Earth's first Recycling City project in Sheffield in the 1980s*
- *Part-funding a European Commission project analysing the composition of waste separated for recycling and residual household waste in 6 European countries.*

Overview

- The consultation document acknowledges the need for the co-operation of the companies who provide goods and the packaging that protects them (page 6) in order to achieve the aims set out in the strategy. INCPEN – whose members comprise a large number of those companies – will be pleased to co-operate with the Welsh Assembly Government in helping to reduce waste and to manage unavoidable waste in a way which protects the environment.
- One of the overriding aims of packaging is to reduce waste – by protecting the more resource-valuable contents. The packaging supply chain has, over the last 30 years, reduced dramatically the amount of resources needed to contain, protect and transport goods. That effort is ongoing.
- Industry has also responded to recent changes in society, such as more single person households, and increased travel which has widened the demands for products from overseas. Reduced UK manufacturing means more goods are imported, with an accompanying need for protection – if a television manufactured in Asia is broken before it reaches the consumer, the resources wasted are at least ten times greater than those that went into the packaging, even if it is not recycled.
- More than 60% of UK packaging waste is already being recycled and, despite perceived wisdom, most local authorities now provide collection facilities for more than 85%, by weight, of all used household packaging via kerbside, banks and recycling centres (glass, metals, cardboard and plastic bottles).

- Despite our broad support for the approach in the strategy, INCPEN would like to offer a word of caution. Mandating that goods or packaging should be reusable or recyclable rather than looking more broadly at total resource consumption can often be counterproductive.
- INCPEN would recommend taking the approach that is encompassed in the Essential Requirements regulations in the EC Packaging and Packaging Waste Directive where manufacturers are required to use – and be able to show that they have used - the minimum amount of packaging commensurate with its function, health and hygiene requirements and consumers' needs. There is clear evidence that this has had a beneficial effect on packaging design, and has averted some packaging even coming to market.

COMMITMENT TO GOALS

Q1 Do you support the strategy's 'zero waste' approach with a long term aim of zero waste and 'one Wales: one planet' by 2050 and a medium term aim of 70% recycling across all sectors by 2025?

INCPEN supports the aim to recycle 70% across all sectors, and to reduce waste to a minimum, as well as the long term aspiration to send no more than 5% of waste to landfill.

However INCPEN believes total resource consumption is the best measure, rather than a focus on waste. For example, putting 10% - 15% plastic components in cars reduces their fuel consumption and associated emissions for its 5-10 year life span, even though recycling that small percentage of the car at the end of its life is more difficult. Life cycle analysis shows that the big environmental impact of a car, or a washing machine (electricity, water, detergents), is in its working life, not when it reaches disposal, so surely it makes sense to focus on the biggest impacts?

The 'spending to save' principle in home insulation means that the use of a few resources (to line lofts and cavity walls, double glaze windows etc) avoids the consumption of many more resources.

So it is with packaging. Whether it is the miniscule amount of plastic in the sleeve that extends a cucumber's life by 14 days and avoids it being thrown away as a slimy mess, or the rather more substantial protection given to mobile phones, it makes sure that the resources already used to grow/manufacture and transport the goods are not wasted.

Being able to reuse or recycle the packaging is a valid aim – and one industry shares – but that misses the point that it has already reduced waste of the far greater amount of resources invested in the products it contains and protects.

Q2 Do you support the development of sector plans? Are there other sectors that need to be covered? Sector plans will be the main delivery documents for implementing this high level strategy, and will be subject to a separate consultation exercise. If you would like to be consulted on any sector plans please supply your contact details.

Taking a sectoral approach seems to make sense, providing they do not conflict with one another. INCPEN would like to take part in the municipal and retail sector plan consultations, as well as, in the future, the food and drink sector consultation.

Q3 Do you support the aim of maximising the social, economic and environmental outcomes (sustainable development) through delivery of the strategy? Are you happy with the headline indicators?

We support the aims of sustainable development provided the social and economic factors are considered alongside the environmental factors and that the environmental factors focus on energy, water and material use as well as waste. Packaging is a good example of a rational use of resources that help consumers live more sustainable lifestyles by delivering products in good condition, appropriate portion sizes and in a variety of ways to suit different individuals' specific requirements.

WASTE REDUCTION

Q4 Massive levels of waste reduction are needed to achieve zero waste and 'one Wales: one planet' levels by 2050. What can the Assembly do to help your sector achieve the waste reduction targets set?

The packaging and product supply chain is constantly looking for ways to reduce packaging still further, for the very simple reason that it adds to their costs and reduces profits. It is important that innovation is not stifled, as that is what helps to make the step changes that have already reduced packaging to the extent that the amount of used packaging sent to landfill has gone down significantly over the last 10 years.

By setting desired outcomes, and leaving industry to decide the best way to achieve those outcomes, the Assembly will help to support and drive innovation for resource/waste reduction.

The Packaging & Packaging Waste Directive already imposes requirements on the quantity of packaging used in the Essential Requirements regulations, where manufacturers are required to use – and be able to show that they have used - the minimum amount of packaging in line with it functioning properly and delivering food and other goods in an appropriate way.

There is a risk in reducing packaging too far. Much higher product wastage can result - creating a net increase in waste.

Q5 Commercial and industrial: your views are sought on which option to use as a basis for waste reduction targets and why.

A linear reduction is difficult to reach because as the 'quick wins' are achieved, the percentage reductions will be harder to reach in later years.

However, there may be unintended consequences of making decisions on waste reduction based on your calculations on reducing the ecological footprint rather than reducing the waste. For example, you state that glass has a low ecological footprint, so there may be a temptation to switch products into glass packaging in inappropriate circumstances. That could result in more lorries to handle the heavier bottles, so have a knock on effect on traffic, fuel consumption and also air quality.

The proposal to concentrate waste reduction activities on the materials with the higher impact to reduce the ecological footprint of waste is focusing too narrowly on waste rather than total resources.

It makes no sense to consider the ecological footprint of packaging in isolation for the footprint of the product it protects.

Setting a 77% overall target for commercial waste at this point seems unnecessary. The lower progression – 57% by 2015/6, 67% by 2019/20 and 70% by 2024/5 is already challenging and can be revisited after 5 or 10 years.

Q6 Municipal: Your views are sought on which option to use as a basis for waste reduction targets and why.

Option 1 is more realistic, allowing for waste growth stabilisation in the early years.

Q7 Reuse target: This reuse target will be predominantly achieved through the reuse of furniture. Your views are sought on whether this target should be higher. If so what other materials could be reused to achieve the higher target?

Reuse of furniture is valuable for third sector involvement but is unlikely to divert large amounts of waste. The target can be revisited after 5 or 10 years.

One of the former reuse options – milk bottles – now makes a limited contribution because of consumer life style changes and also because small local dairies have been mostly replaced by larger companies, which operate to higher environmental standards. That changes the environmental and economic factors associated with collecting and cleaning the empty bottles and refilling them. Few people want doorstep milk deliveries today, partly because they do not want their milk left standing outside all day while they are at work and partly because many people now like to do a weekly supermarket shop for most of their needs.

RECYCLING

Q9. Commercial and industrial: Which recycling rate is feasible (70% or 77%) and why?

Covered above.

Q10. Municipal: Are the targets set for municipal waste recycling and landfill diversion correct?

The 70% recycling target for municipal waste alone by 2025 is very ambitious. Places such as Flanders which have achieved very high recycling after many years of effort include additional wastes (such as commercial and industrial) in their definition of municipal waste, whereas the UK does not. In addition they send 25% of waste to incineration with energy recovery and 25% of households have home composting. They have over 100 reuse shops across the country and they charge households either by volume or weight of waste generated.

ROLES AND RESPONSIBILITIES

Q14. What role can you/ your organisation play in helping deliver this strategy? What more can the Assembly do?

Our research over the last 35 years has provided us with a clear understanding of the role that packaging plays in reducing product wastage and has highlighted where there are opportunities for improvement. One of our main aims is to encourage companies to continuously improve the environmental impact of producing, distributing and using packaged products and to support increasing the recovery of materials and energy from used packaging.

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