



**Friends of
the Earth**

Consultation on recycling targets for packaging for 2008 and thereafter

Response from Friends of the Earth

November 2007

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- the most extensive environmental network in the world, with around 1 million supporters across five continents, and more than 70 national organisations worldwide
- a unique network of campaigning local groups, working in more than 200 communities throughout England, Wales and Northern Ireland
- dependent on individuals for over 90 per cent of its income.

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Introduction

Friends of the Earth welcomes this opportunity to comment on the Government's proposals for revisions to packaging recycling targets.

We believe that waste policy should be aiming to improve the UK's resource efficiency, and minimise our climate impacts, by maximising prevention, reuse, recycling and composting, and by gradually phasing out residual waste.

We welcome the Government's intention to increase the recycling targets for packaging, however we find the proposed targets extremely disappointing. We strongly believe that the government is missing an important opportunity to oblige the packaging industry to redesign its products and invest in recycling, in order to reduce climate emissions.

In Friends of the Earth's view, the packaging recycling targets are one of the few producer responsibility tools that the UK has available to change the way products (in this case packaging) are produced and dealt with, and so offer a potentially important tool to encourage design for recycling, and to provide investment in recycling systems. Unfortunately the government has chosen to throw away the opportunity to have this influence.

In our view these targets should be used to give a clear signal to the packaging industry that they must make sure that their materials are easy to recycle. It is clear that the public would support such a measure, as surveys show how annoyed people are at having to put 'unrecyclable' packaging into their residual waste bin. Only a step-change in targets will have the impact that is required.

Response to questions

Question 1. [Packaging Growth Rates] Do you agree with our assessment and proposals? Are you aware of any other factors which may affect the levels of packaging entering the waste stream? Please provide us with as much evidence as possible to support your answer.

It is disappointing that the government is predicted continued increases in packaging waste volumes. This clearly suggests that the voluntary commitments made by retailers and others are going to be ineffective. If this is the case, as seems likely, then the government should be examining a legislative solution to this problem and should not be claiming these voluntary agreements as a success.

Question 2. [Obligated tonnage] Do you agree with our assessment? Are you aware of any other factors which may affect the levels of obligated tonnage reported? Please provide evidence to support your answer.

The system that the UK Government has devised, in association with the packaging industry, in order to meet EU Packaging Directive targets, has clearly got many flaws. In Friends of the Earth's view it is the responsibility of the Government to ensure that its system works effectively, taking account of all packaging waste. Given the packaging industry's enthusiasm for the UK approach, they also have a responsibility to make the system work effectively.

Question 3 [Free Riders] Do you have information on the number of free-riders and the estimated levels of obligated tonnage affected? (Please note that all comments will be treated confidentially).

As question 2.

Question 4. [Carry forward & obligated tonnage] Do you agree with the Government's recommendation? Please provide evidence/rationale for any comments submitted. We also welcome any comments you may have on the accompanying Impact Assessment.

As question 2.

Question 5. [Recycling and Recovery targets] Are the targets proposed for 2011 and 2012 set at an appropriate level? Please provide evidence for any proposals to increase/reduce the levels indicated.

In Friends of the Earth's view, these targets are extremely weak and are not commensurate with the urgent need to improve our performance on climate change. The consultation paper itself states, referring to the preferred option 4, "this option proposes relatively small year-on-year increases in the business targets."

We do not believe that these targets will create redesign of consumer packaging to make it more recyclable; support for our point of view comes from the November issue of ENDS Report (page 19, "WRAP seeks recovery options for mixed plastics"), in which it is stated:

*"WRAP said ... the supermarkets want their packaging to be genuinely recyclable. The move is not related to targets under the EU Packaging Directive to recycle plastics, or the higher targets proposed by the Environment Department. **Industry believes these can be met through the recycling of commercial packaging waste**".* [our highlighting]

So, the supermarket's desire for recyclable packaging (which comes as a result of public pressure) will not be assisted by the Government's new targets. It is shocking that the Government has a producer responsibility measure in place which could be used to oblige producers to make their products more recyclable, yet is not prepared to use it effectively.

Looking at individual materials, and the Government's preferred 'Option 4':

Aluminium

Aluminium is a very recyclable, high value material, with aluminium cans worth at least £700 per tonne¹.

The European Aluminium Association has produced a league table of aluminium can recycling in 2005²:

Country	Al can recycling rate in 2005
Norway	93
Finland	88
Switzerland	88
Sweden	86
Denmark	84
Benelux	80
Germany	73
Turkey	70
Spain	53
Austria	50
Poland	50
Italy	48
United Kingdom	41
Ireland	39
France	38
Greece	36
Portugal	35
Hungary	33

¹ <http://www.letsrecycle.com/prices/metalsPrices.jsp>, viewed on 29/11/07.

² http://www.eaa.net/eea/downloads/PR_%20Packaging_Alum%20bevcans%20share%20recycling%202005_Jun2006.pdf

This data – based in the UK’s case on the packaging recycling system – shows that the UK’s record on aluminium can recycling is very poor. This is surprising when the value of aluminium cans is considered, and with the substantial climate benefits that come from recycling aluminium cans – as the industry themselves state:

- “Recycling uses only 5% of the energy needed to make aluminium from its raw material, bauxite - that’s a 95% energy saving”³

Clearly, when other countries are already recycling around 90% of their cans, the UK Government – with its commitment to acting on climate – would be aiming to match these rates?

Here are the figures in the Government’s preferred option 4:

2009	2010	2011	2012
39%	40%	41%	42%

NB: These figures cover all packaging aluminium - though cans will be the bulk of this. The government also states that the target will be increasing by 1% per year. This suggests that we are on course to reach the Norwegian aluminium can recycling rate in around 55 years – this is not an ambitious commitment for a government committed to action on climate change.

Aluminium is a very recyclable, high value material, with other countries already recycling around 90% of cans. A 1% increase in recycling per annum is totally pathetic. Friends of the Earth proposes that the increase should be 10% per annum, allowing us to reach European best practice levels in around 5 years. If current recycling systems will not achieve these levels, then new ones must be developed. Other countries can do it, so surely we can too.

Plastics

Recycling of plastics is the best option for the climate, as has been acknowledged in the England Waste Strategy (Page 56):

“Plastics. Burning plastics has a general net, adverse greenhouse gas impact due to the release of fossil carbon. Recycling shows significant potential for carbon and energy savings through displacing virgin materials, although the scale of this varies widely with the processing route.”

Given this knowledge (which also demonstrates why Friends of the Earth opposes ‘recovery’ targets), the public irritation with putting plastic packaging in the bin, and the Government’s commitment to action on climate change, one would expect the government to be proposing to oblige industry to ensure that plastic packaging is recycled. The proposed targets tell a somewhat different story:

2009	2010	2011	2012
27%	29%	31%	33%

The government is therefore proposing that 2/3 of plastic packaging will still be going into the rubbish bin in 5 years time, as a result of an increase of only 2% per annum. This is not an adequate response to climate change, or to the public desire for action on this issue. Friends of the Earth accepts that it is more difficult to increase plastic recycling rapidly, due to the need for packaging re-design. However, this redesign will only happen if the industry knows that it has no choice.

Friends of the Earth would therefore propose that the plastics recycling target should be increased by at least 5% per annum, and that the increases must continue beyond 2012.

³ <http://www.alupro.org.uk/recycling%20habit.htm>

Glass, paper and steel and wood

The Government's preferred 2012 targets for these materials are:

- Glass – 84%, 2% increase per year
- Paper – 71.5%, 1% increase per year
- Steel – 71%, 1% increase per year
- Wood – 24%, 1% increase per year

Given the recyclability of glass, paper and steel, Friends of the Earth views these targets as too low; in order to maximise our overall recycling rates, we should be maximising our recycling of these materials, aiming at over 90%. For example, we would suggest that paper should have a target of 90% by 2012 with interim targets of 75%, 80% and 85%

In the case of wood, we would also suggest that there is a potential to further increase the recycling rate.