



**Friends of
the Earth**

Consultation on Implementing the Packaging Strategy

Response from Friends of the Earth

May 2010

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http://www.foe.co.uk/community/campaigns/healthy_planet/incineration_index.html

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- the UK's most influential national environmental campaigning organisation
- 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 the opportunity to respond to the Consultation on Implementing the Packaging Strategy.

Friends of the Earth believes that, alongside waste prevention and the reuse of products and materials, recycling has a vital role to play in helping the UK both to meet its climate change obligations and to develop a truly sustainable economy with resource efficiency at its heart. All waste streams, including packaging, must aim to maximise recycling rates if the UK is to meet these obligations.

We therefore welcome the ambition set out in this consultation, but consider that in some respects the UK could and should go further. The UK has made considerable progress in recycling of waste over the last decade but is still far short of its stated ambition to be amongst the best performers in Europe. The ambition set out in the consultation, whilst welcome, could still leave us short of the best performers a decade hence.

Consultation questions.

Chapter 1

Q1. In your view, are our projections for waste arisings reasonably accurate? 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, so we can adjust our figures as necessary.

Friends of the Earth questions the assumptions behind the projections for rising packaging waste across the range of materials. The projections see a growth in packaging waste across all streams except steel.

The growth between 2010 and 2020 ranges from 10.02% for aluminium to 27.4% in plastics.

Reasons for questioning the assumptions behind these projected rises include:

- They sit at odds with the Waste Framework Directive (and associated policy) that explicitly requires that first and foremost effort is made to prevent waste
- These figures instead suggest a 'predict and provide' approach to dealing with packaging arisings, rather than showing any signs of the requisite level of intervention
- According to Defra figures municipal waste arisings have stabilised and, arguably, have fallen over much of the last decade and even before the recession. The assumption that packaging waste will continue to rise in spite of the opposite trend in municipal waste arisings is questionable.
- The impact of the inevitable rise in oil, energy and raw material prices, coupled with improvements in ecodesign and packaging efficiency, is most likely to be a reduction in packaging waste, not an increase as projected.

It is to be desired and indeed, we would argue, likely, that waste prevention policies and targets are in place well before 2020, with resultant reductions in packaging waste arisings.

Q2. In your view, are the predictions for obligated tonnage reasonably accurate? Are you aware of any other factors which may affect the levels of obligated tonnage reported?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

As above for question 1, it is likely that the absolute figures for arisings and thus, by proportion, for the targets is higher than reality is likely to dictate. Thus whilst Friends of the Earth support as a minimum the proportional targets (i.e. the percentages) we question the size of the absolute figures that these projections give rise to.

Q3. Do you agree with our proposed targets for paper/board, and our analysis of what they are likely to require?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Friends of the Earth supports as a minimum the target for paper and board. However we advocate a much greater effort at the municipal waste front in order to increase the proportion of these wastes collected by local authorities. Given, as this consultation states, currently only 54% of local authorities collect these streams, a significantly greater share of the burden could yet be carried through municipal waste recycling.

Q4. Do you agree with our proposed targets for glass and our analysis of what they are likely to require?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Yes, Friends of the Earth does support as a minimum the target for glass. However given that the best performance in the EU already¹ exceeds 70%, and given the high carbon saving associated with glass recycling, we advocate a higher target of 75% by 2020.

Further support needs to be given to local authorities to both increase glass collection rates and to improve collection quality. This will include a shift towards source separate – rather than commingled – collection.

Friends of the Earth strongly supports an ambition to greatly increase commercial and industrial glass collection and looks forward to the publication of detailed proposals to this end.

Q5. Do you agree with our proposed targets for aluminium and our analysis of what they are likely to require? We would also welcome your views on how aluminium in composite applications should be accounted for.

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Friends of the Earth supports this target as a minimum. We acknowledge the difficulty caused to reaching this target by the large quantity of composite-forming aluminium that is 'lost' to recycling. It is nevertheless unacceptable that so much of a valuable, expensive and energy

¹ Prognos, IFEU and INFU (2008), Resource savings and CO2 reduction potentials in waste management in Europe and the possible contribution to the CO2 reduction target in 2020, Berlin: Prognos

intensive resource is lost and so steps must be taken to prevent that loss. These include setting a target ambitious enough to drive improvement, and then improved 'ecodesign' to allow for easier recovery for recycling, and/or phase out of non-recyclable composites.

Other measures including deposit incentives-to-return should be considered, such as that used in Germany

Q6. Do you agree with our proposed targets for steel, and our analysis of what they are likely to require?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Friends of the Earth supports this target as a minimum. However we believe that it could be raised further to meet the levels achieved by the best performers in Europe². Again a deposit and return scheme could aid achievement of this target whilst according with the coalition government's stated aim of rewarding recycling.

Q7. Do you agree with our proposed targets for plastic and our analysis of what they are likely to require?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Whilst Friends of the Earth supports these targets as a minimum we believe the overall target lacks ambition and must be raised, concomitant with a genuine effort at reducing plastic packaging waste. The latter is particularly conspicuously contradicted by the large projections for increases in this waste stream.

Though these targets would place the UK amongst the top recyclers today it is likely that they will prove to be considerably below best performance come 2020.

It is unacceptable that come 2020 the UK would still *not* be recycling 43.1% of plastic packaging. This is of particular concern given:

- The high demand for this material;
- The high and rising cost of oil, and the pressure that biogenic feedstock would place on other land uses, food prices and so on;
- The prominent and extreme impact that plastic waste has on the environment, and on ocean ecosystems in particular;
- The high carbon savings associated with plastic recycling.

The Somerset Waste Partnership provides a good example of the type of effective closed-loop recycling scheme that should be pursued.

² Eurostat, Packaging waste, Data 2007 (updated 15 March 2010)
<http://epp.eurostat.ec.europa.eu/portal/page/portal/waste/documents/Packaging%202010%2003%2012%20publication.xls>

Q8. Do you agree with our proposed targets for wood and our analysis of what they are likely to require?

Please provide evidence to support your answer, so we are in a position to adjust our figures as necessary.

Friends of the Earth supports a high target for wood recycling. In doing so we acknowledge issue of competition from energy generators wishing to use this waste for fuel and call on government to develop proper life cycle analysis of the relative benefits of wood recycling and energy recovery to identify where the best savings are in terms of carbon as well as wider economic, environmental and social impacts.

Where it is the case that it is better to recycle the wood steps need to be taken to ensure that recyclers are not priced out of the market by competition from energy companies. This may involve either regulation to prevent wood waste being burnt, or active intervention to prevent price rises due to competition from the energy industry.

Arguably, where it is demonstrable that wood waste is better recycled than used for fuel, the target should be raised sooner rather than later in order to ensure protection of current relatively high recycling rates.

Q.9 Do you support government“ s preferred option of increasing targets between 2010 and 2020?

Friends of the Earth supports the preferred option as stated in the consultation document. Much packaging waste is still not recycled. Public distaste for the amount of packaging they have to deal with should be considered a key driver to and justification for greater packaging prevention and better recycling performance.

A high recycling target will drive waste prevention as well as recycling by providing an incentive to reduce the amount of waste that will require recycling.

All waste streams require targets set at the upper ranges of achievability to maximise economic, environmental, and social benefits. There is no convincing reason for why packaging waste should be set recycling targets below that required for other sectors. Given that we should be aiming for still higher targets beyond 2020 it certainly makes economic sense to set ourselves on course for more rather than less ambitious 2020 targets now.

Q.10 What do you think are the reasons for the “obligated tonnage gap” in glass and plastics?

What can be done to reduce that gap (and who should do it)?

Friends of the Earth is not responding to this question.

Q.11 Do you support government's proposal to split the glass target in line with end-use and reduce the allowable recycling through aggregates over time? Have you got any data which would make our estimate of total tonnages of glass going to re-melt, aggregate or other end-uses more accurate? If so please provide it with your response.

Yes, Friends of the Earth does support the proposal to split the glass target. The environmental benefits in 'recycling' glass to aggregate are negligible, whilst those associated with re-melt are considerable³.

In considering how best to divert recycled glass towards re-melt and away from aggregate government must not overlook the important role that source separation, as opposed to commingling, plays in ensuring high quality.

We do not have specific data on glass tonnages to re-melt, aggregate or other end-uses, but our Gone to Waste⁴ report provides a recent assessment of the value and volumes of waste streams in the UK and across Europe that are either recycled or disposed of to landfill and incineration.

Q.12 Do you support government's proposal in principle to split the plastics target? We would welcome views from producers regarding the administrative burden of the proposed change in data collection.

Friends of the Earth would welcome a focus of funding and effort on underdeveloped streams. Friends of the Earth therefore supports the proposal to split the plastics target. Plastics recycling is particularly poor and this is in large part due to the number of plastics streams that are not currently collected and recycled.

Chapter 2

Friends of the Earth is not responding to any of the questions in Chapter 2.

Chapter 3

Friends of the Earth is not responding to any of the questions in Chapter 3.

³ http://www.wrap.org.uk/business/glass_collection_directory/environment_benefits.html

⁴ http://www.foe.co.uk/resource/reports/gone_to_waste.pdf