



Mr. Olivier Gaillot
RPS Group

Emailed to repakstrategy@rpsgroup.com

10th August 2018

Re: Repak Plastic Packaging Recycling Strategy 2018-2030

Dear Olivier,

Further to a request from Mr. Seamus Clancy in REPAK, the IWMA offers the following comments in relation to the above-referenced consultation.

The IWMA represents the companies that collect and sort recyclables, including recyclable plastics. Our interest in this strategy is therefore focussed on maximising the volume of materials recycled and minimising the amount that ends up as residual waste.

In our experience, recycling is driven by demand for second-hand raw materials. That demand can be created by a number of factors, such as those addressed below.

The recyclability of the material

A good example of this is aluminium cans, where there is a constant demand and a high value. Recovered glass is also in constant demand as it is easily recycled. Paper is another example.

Many plastics are not easily recycled, so we support the moves by the EU Commission in the EU Plastics Strategy to mandate that all plastics packaging placed on the EU market by 2030 is either reusable or can be recycled in a cost-effective manner.

We also support a better system of labelling plastic products. A standard needs to be set whereby a plastic product cannot be labelled 'recyclable' unless it is technically and economically feasible to recycle it. Plastic products that do not meet that standard should not be allowed to be placed on the market in Ireland or in the EU.

The cost of virgin raw materials

Aluminium is a good example here also, as aluminium extracted from Bauxite is very expensive and that puts a high value on the second-hand raw material in the form of aluminium cans. In contrast, the demand for recycled aggregate is low in Ireland, as the cost of extracting virgin aggregate is low.

The high demand internationally for certain plastics, such as PET Bottles, HDPE bottles and Clear LDPE suggest that the cost of the virgin raw materials for those plastics is high enough to create a demand for the recycled materials. However, that is clearly not the case with many plastics that have little or no demand internationally.

An increase in the price of oil would probably increase demand for recycled plastics, but Ireland and the EU has no control over the international price of oil, so there is little that can be done in this regard.

Legal requirement for recycled content

In the absence of a natural market for recyclables, an artificial market can be created by Governments insisting on a certain level of recycled content in specified products. This is better achieved by global agreement or at least by European agreement, rather than individual countries imposing their own rules.

There is some precedent for this type of legislation. We understand that last year the State of California introduced legislation that mandated recycled content for beverage containers. Similar mandates for plastic film used for garbage bags and rigid non-food containers have also been in place since the 1990s in parts of the US.

The IWMA supports the EU Commission's plans to mandate minimum recycled content in all suitable plastic products. We suggest that 25% recycled content by 2025 would be a good start.

Better quality recyclables

The quality of recyclables collected at the 'back door' of businesses is generally very good compared with post-consumer recyclables, particularly when those recyclables are collected in a co-mingled bin (both household and commercial) and are often contaminated. Materials such as clear plastic film, wooden pallets and cardboard collected from the back door of businesses generally attract good end markets due to their quality.

The IWMA, REPAK and DCCAE have been working together during the last 12 months to provide information to the public that can help improve the quality of post-consumer recyclables. We hope that this work will continue into the future and we suggest it should be included in the strategy. As well as reducing contamination in the recycling bin, there needs to be a focus on moving good value recyclable materials (e.g. plastic bottles) from the residual waste bin to the recycling bin.

The new requirements for incentivised charging for household waste collection should also help householders to think about what they put in each bin. It is essential that the enforcement authorities are vigilant with respect to companies that continue to offer flat fees or offer pricing structures that do not incentivise the householder to take an interest in the contents of their bins.

Better segregation at MRFs may also help with quality issues, but the wide variety of plastic products presented to the MRFs and the degree of contamination attached to them, makes this task very difficult. There may be opportunities to make certain plastics more

identifiable at MRFs to help with automated segregation and we suggest that the Strategy explores that particular area.

Given the low population density and the high percentage of rural dwellers in Ireland, the introduction of more bins and more collections would drive prices very high and would, in our opinion, be very unpopular with the public, so we suggest that we work on maximising the recycling outputs from the existing 3 bin system (2-bin in rural areas) before we consider a more expensive collection system.

Other Issues for Consideration

We suggest that a Packaging Waste Forum could and should be established to allow better communication between packaging producers, waste packaging recyclers and recovered packaging re-processors.

We also recommend investment in facilities for capture of plastic recyclables at shopping centres, business districts, recreational centres, public events, etc. These should probably target particular plastics, such as bottles to avoid widespread contamination. Some creative thinking would be welcome to attract people to use such receptacles responsibly.

We do not support a universal '*deposit and return scheme*' for plastic bottles as we believe that this could impact on the viability of the collection of kerbside dry recyclables and would undoubtedly fail a 'cost-benefit analysis' test, both economically and environmentally.

The development of indigenous re-processing infrastructure for recovered plastics should be strongly encouraged and supported by REPAK, by plastic packaging producers, by the EPA and by the DCCA. This support could include investment, assistance with products and assistance with achieving End of Waste status for the re-processed plastics.

The EU targets for plastic packaging recycling do not differentiate between the different types of plastic products, yet some are more recyclable (technically & economically) than others. We encourage REPAK and the Irish Government to lobby the EU, when setting targets, to differentiate between plastic packaging that is economically recyclable such as PET bottles, HDPE bottles and clear LDPE and not to extend the targets to other plastics that have no market demand.

In the meantime, we suggest that REPAK and the Irish Government should focus on maximising the recycling of plastic packaging products that have available markets, such as PET bottles, HDPE bottles, clear LDPE (business back door), etc. A very large quantity of these materials is lost in the residual waste stream and the strategy should focus on encouraging and assisting the public (household and commercial) to place these materials in the recycling bins.

The mixed film that has no market cannot be recycled currently, so the strategy should promote the best environmental option for these materials, which is waste to energy (either SRF or incineration). These mixed films are problematic in the co-mingled bins as they often end up in recycled paper bales, so they are a hindrance to recycling of the materials that have market demand.

Pots, tubs and trays are comprised of different plastics and are often comprised of more than one type of plastic and are often contaminated with food, so this waste stream is somewhat problematic. However, these materials literally carry more weight than mixed plastic film and efforts to make these materials more attractive for recycling would be welcomed by our members.

We hope that this submission is helpful and we are very supportive of the efforts of REPAK and their team to develop this strategy in a timely and inclusive manner. We look forward to further engagement as the strategy develops.

Yours Sincerely,

A handwritten signature in black ink that reads "Conor Walsh". The signature is written in a cursive, flowing style.

Conor Walsh
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