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Suggested Content for Packaging Producers affected by CIOs	
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The purpose of this document is to help PackCare Members, whose main packaging activity is “Selling (to end users)”, comply with the Consumer Information Obligations.

The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 state: paragraph 4 (d) A... Producer ... must ... if his main activity is that of seller, provide information to consumers of the goods sold by him about –

- i. The return, collection and recovery systems available to them;
- ii. Their role in contributing to the reuse, recovery and recycling of packaging and packaging waste;
- iii. The meaning of related markings on packaging that he places on the market and that relates to his recovery and recycling obligations; and
- iv. The chapter dealing with the management of packaging and packaging waste in any strategy prepared under section 44A or 44B of the 1990 Act (national waste strategy), (in these regulations referred to as the “consumer information obligations”)

Useful Links:

iii. Meanings of related markings – **IN**dustry **C**ouncil for **P**ackaging and the **EN**vironment (INCPEN) <http://www.incpen.org/displayarticle.asp?a=13&c=2>

iv. Waste Management Plan for England https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

v. The Packaging (Essential Requirements) Regulations 2015 www.legislation.gov.uk/ukxi/2015/1640/contents

For an explanation of i and ii, please refer to the following:

The accepted hierarchy of environmental best practice with regards to packaging is, in order of preference: Reduce, Re-use, Recycle, Recover, and lastly, Landfill. The practical meaning of these different options is outlined below:

Reduction is achieved by reducing the amount of packaging used and so minimising the quantity of raw materials, including energy, consumed. Typical examples include reducing the number of layers, reducing the size of container, its thickness and the quantity of padding used. Packaging reduction must be balanced against the need to protect the product from degradation and damage and satisfy marketing requirements.

Re-use of packaging can generally result in a saving in terms of both costs and resources. This might involve replacing one-way packaging with more robust multi-use versions or even purpose-built, re-usable boxes, containers, drums, pallets, etc. The increased initial costs and resources should be offset by the savings over the life of the packaging. This approach is most viable where regular, repeat deliveries are made to the same customer and packaging can be returned empty or with product or waste. You should consider the viability and costs of return transport. Furthermore, the packaging can be utilised for product presentation, as with milk cages and bread baskets in supermarkets. Cardboard boxes are more easily re-used if they are plain and of a standard size. It may also be possible to re-use robust outer containers by adding a thin, light, inner lining which can be removed at the destination along with the product, leaving the outer container undamaged.

Recycling involves the mechanical processing of pre-used packaging to produce a fresh product or packaging item. This may include composting. The advantages of this are that less raw materials are consumed and less waste ends up in landfill. The keys to viable recycling are segregation and an efficient collection system. Materials must be free from contamination and, in particular, plastics should be separated into the different polymer groups. Light, bulky materials such as cardboard, plastics and empty cans or drums should be compacted, baled or shredded to maximise collection payloads; thereby, reducing fuel usage and transport costs.

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Where you can influence packaging design, you can specify that packaging is made from recycled (rather than virgin) materials, ensure that plastics are made from a single polymer wherever possible, and are always marked with the relevant identity symbol to aid identification (Please refer to the environmental labelling symbols under “Useful Links” on Page 1). Laminates and composites are difficult to segregate and may therefore be uneconomical to recycle. Where possible use single material types or easily separated packaging. For example: instead of a cardboard packet with plastic window glued in place, you could use a plastic bag inside a separate paper sleeve with a window cut out of the sleeve. Whilst many plastic Reprocessors are small scale operations, who collect scrap packaging waste directly from Producers, larger steel, paper, chipboard and aluminium mills rely upon a network of local merchants to collect from individual Producers, who then sort and deliver bulk loads to the mills. To identify packaging recycling companies, it may be worth contacting the following trade organisations:

- Aluminium Packaging Recycling Organisation (Alupro): www.alupro.org.uk
- Association for Organics Recycling: www.organics-recycling.org.uk
- British Glass Recycling Co Ltd: www.britglass.org.uk
- British Metals Recycling Association: www.recyclemetals.org
- British Plastics Federation: www.bpf.co.uk
- Confederation of Paper Industries: www.paper.org.uk
- Independent Waste Paper Processors Association: www.iwppa.co.uk
- Recoup (RECYcling Of Used Plastics): www.recoup.org
- Textile Recycling Association: www.textile-recycling.org.uk
- Think Cans (Aluminium Can Recycling from Novelis): www.thinkcans.net
- Timber Packaging and Pallet Confederation: www.timcon.org
- Wood Recyclers Association: www.woodrecyclers.org

Recovery in this context means recovering energy from the waste packaging by combustion and using this to generate electricity, hot water or useful heat. Energy from Waste (EfW) plants or Energy Recovery Facilities (ERFs) are particularly relevant in large cities where there are no nearby landfill sites and there is a local market for the energy produced. Small EfW units can be viable at factory level, as these most commonly burn cardboard/paper, timber/sawdust, solvents or oils, rather than mixed general waste because they must meet strict emissions standards and are cheaper to manufacture when a single fuel stream is used. The energy created from waste packaging can be used to heat buildings, power chiller units, or be used as part of the production process. It might also provide all of the energy requirements or be used to supplement more traditional power sources. This type of system is most appropriate for those with large quantities of clean combustible packaging waste and a need for thermal energy. It is becoming an increasingly attractive option, following the introduction of the Climate Change Levy and Government subsidies for combined energy systems. Please refer to:-

- Renewable Energy Association: www.r-e-a.net

Landfill is the option of final resort. Packaging waste should be transported by a registered waste carrier to an appropriately licensed site, possibly via a registered waste transfer station. The carrier should supply you with a Waste Transfer Note (WTN) for each consignment or an annual WTN, where repeat transfers of similar waste are made from the same source to the same destination. The waste carrier should also provide copies of relevant licences and details of the full audit trail on request. Under the Duty of Care legislation, producers of waste share the responsibility for the safe and legal disposal of waste even after it has left their premises. Please contact your local Environment Agency office for further details.

For further information regarding recycling options for packaging waste, including balers, compactors, containers, shredders and other recycling equipment, please contact Martin Fortune at Key Waste Solutions Ltd: www.keywaste.co.uk