

Written evidence Submitted by Tetra Pak

Executive Summary

- **Beverage cartons should be included in the Deposit Return Scheme**
 - The inclusion of cartons will help support the UK Government's aim to achieve a truly circular economy, tackle climate change, and reach net zero.
 - It will also will support the industry's ongoing efforts to increase carton recycling rates, will provide access for the industry to an important source of high quality liquid paper board for new cartons, and will minimise consumer confusion.
- The DRS should:
 - **be 'all-in' and as wide in scope as possible** in terms of materials and product categories;
 - **be industry led and operated**;
 - **be consistent across all four UK nations**;
 - make use of **the next generation of smart DRS technologies**.
- The DRS should complement existing recycling systems, in particular kerbside collection, and sufficient funds should be made available to local authorities to maintain these services.

Introduction

Tetra Pak places sustainability at the core of our business. Our cartons are predominantly made from renewable raw materials, can carry the FSC® label, and are designed to be low-plastic, low-carbon, and recyclable.

Tetra Pak is committed to beverage carton recycling and increasing recycling rates. We use high quality raw materials to make our packaging, and all components of our beverage cartons are recyclable in accordance with international standards and are simple to recycle.

In the UK, we have invested significant resources in the development of carton recycling facilities and processes to make it as easy as possible to recycle cartons. Currently cartons are collected for recycling in over 94% of local authority areas, with 69% implementing kerbside collection from the home. Through our industry trade association ACE UK, we are continually working with councils to increase this figure, and as part of this process, in 2013, facilitated the opening of a dedicated large scale carton recycling plant in Halifax.

But recyclability is just one aspect of sustainable packaging. It is crucial that policy makers consider where materials come from, their climate impact throughout their life, as well as how they are treated after use. We strive to deliver the world's most sustainable food package system, designed to reduce food waste and minimise water and energy use: carbon-neutral, fully recyclable, and made solely of sustainably-sourced renewable or recycled materials.

In parallel to our commitment to exploring the opportunities and challenges of increasing recycled content in our packaging, we are moving away from fossil-fuel based plastics wherever possible. We are currently switching from fossil-fuel based to plant-based plastic, through the use of sugar cane polymers for the caps and necks of cartons.

Tetra Pak's position on Deposit Return Schemes

Tetra Pak is determined to play a positive role in the development and implementation of a UK Deposit Return Scheme.

We support the inclusion of beverage cartons in the DRS for three key reasons:

- 1. Inclusion will increase beverage carton recycling rates;**
- 2. Inclusion will secure access to high quality recycled liquid paper board that can be used to make new beverage cartons;**
- 3. To avoid confusion amongst consumers who are used to recycling cartons alongside other materials**

Furthermore, considering the low carbon, low climate impact of beverage cartons, it would be a mistake to disincentivise manufacturers from choosing beverage cartons as their packaging material in favour of more carbon intensive packaging, such as PET plastic packaging. There is real potential for this if manufacturers believe that non-inclusion in a DRS could negatively impact public perception of beverage cartons, and therefore their product.

Scheme Design

We believe that an effective DRS should be based on the following principles:

1. It should be as wide in scope as possible

All drinks categories, including dairy and juice products, all materials, and containers up to four litres in size should be included. This will help reduce consumer confusion, increase system efficiency, and ensure a level playing field between all producers.

Dairy products are included in several DRS systems around the world and pose no hygiene risk.

2. The DRS should be industry owned and operated

This will allow existing logistics and supply chain networks to be leveraged.

3. The DRS should be consistent across all four UK nations

Inconsistencies between Scotland and the rest of the UK risk creating labelling problems for manufacturers, and potentially increase the risk of fraud. While Scotland has already decided on the initial materials to be included in its DRS, a review in

2026 provides an opportunity for Scotland to widen the scope of its scheme, and align with an all-in DRS in England, Wales and Northern Ireland.

4. The DRS should include 'Smart' DRS technologies

Next generation DRS technologies, such as smart reverse vending machines and smart bins:

- better prevent fraud through more complex security markings
- can modulate deposit levels across different packaging formats
- offer decentralised, hassle-free collection and platform solutions, creating a more level playing for retailers by removing many of the administrative burdens of a DRS, which smaller retailers and shop keepers are less able to absorb
- provide far greater flexibility from both a hardware and software perspective.

DRS and other recycling and sustainability measures

The new DRS must complement other existing, and proposed, collection systems. For example, a DRS is likely to divert material away from kerbside collection, which will have implications for the revenues generated for local authorities. Government must ensure that local authorities continue to have the necessary funding to deliver effective kerbside collections of recycling.

In our experience DRS returns greater quantities of material and a better quality of material for recycling than kerbside collection, but exclusions (whether based on products, formats or pack sizes) can cause consumer confusion.

We believe that parallel systems of kerbside collection, funded by industry contributions through EPR, and all-in deposits for all beverage containers, including beverage cartons, is the most effective approach for the UK.

Improving consumer participation

For any consumer recycling scheme to be successful, it needs to be simple and clear for the public, to motivate participation. The easiest way to achieve this clarity is to include as many packaging types as possible, and not exclude items based on the food or drink content.

The UK must foster a better recycling culture, and the best way to do that is to encourage consumers to recycle as many different packaging materials as possible, in the most convenient way for them.

About Tetra Pak

Tetra Pak is a world leading food processing and packaging solutions company. Working closely with our customers and suppliers, we provide safe, innovative and environmentally sound products that each day meet the needs of hundreds of millions of people in more than 160 countries. With over 25,000 employees around the world, we believe in responsible industry leadership and a sustainable approach to business.

Our promise, "PROTECTS WHAT'S GOOD™," reflects our vision to commit to making food safe and available, everywhere.

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