



## **Written evidence submitted by the Alliance for Beverage Cartons and the Environment (ACE UK) to the Environment Bill Committee**

*July 2020*

### **1. About ACE UK**

- 1.1 ACE UK is the trade association and recycling organisation for the beverage carton industry in the UK. Its members are the principal suppliers of paper-based beverage cartons to the UK market – Tetra Pak, SIG Combibloc and Elopak.
- 1.2 The sector, through ACE UK, has worked to significantly increase beverage carton recycling, particularly over the last 13 years following the introduction of its national, free of charge bring-bank collection system. In that time, the extent of kerbside collection of beverage cartons has also risen from 5% of local authorities to 68% today.
- 1.3 Where local authorities are not yet able to collect cartons at kerbside, for contractual or financial reasons for example, ACE UK continues to offer a free of charge bring bank collection. A further 26% of local authorities use this service, meaning that in total 94% of UK local authorities offer beverage carton collection to their residents.
- 1.4 The beverage carton industry has also developed large-scale reprocessing capacity in the UK, in collaboration with paper and packaging manufacturer Sonoco Alcore, offering a guaranteed route to market for both post-consumer and pre-consumer material.
- 1.5 A facility to recycle the polymers and aluminium foil in beverage cartons has also been commissioned, meaning that all components of the package are fully recyclable.

### **2. Summary**

- 2.1 ACE UK welcomes the opportunity to comment on the Environment Bill. We have chosen to focus our comments on Part 3 of the Bill dealing with Waste and Resource Efficiency.
- 2.2 We welcome a policy framework which requires producers to take more responsibility for its waste, and beyond that are supportive of the introduction of a well-designed, comprehensive EPR system which collects all recyclable packaging through a nationally-consistent kerbside collection system.
- 2.3 However, we are concerned that the beverage carton remains absent from the proposed core list of materials for kerbside collection across England, and believe that its continued omission would be a backward step for both the UK's environmental ambitions and for consumers who already recycle cartons at kerbside.
- 2.4 We also strongly support the introduction of a specific beverage carton target to drive collection. Beverage cartons are currently within the paper target, but we advocate removing them from paper because (a) paper exceeds its target without needing to capture any laminated fibre packaging, which is therefore not prioritised by paper reprocessors; and (b) beverage cartons should not be collected and reprocessed as part of a mixed fibre grade in any case. They should be collected with containers, sorted and reprocessed at an appropriate facility so that all component materials can be fully recycled and the value of each can be realised.
- 2.5 As the UK transitions towards a low carbon economy it is important to recognise the role that bio-based packaging, such as beverage cartons, can play.
- 2.6 We are supportive of a deposit return scheme but do not believe it should be rolled out immediately.
- 2.7 Rather, the new EPR system should be allowed time to establish itself and show its value. This time should be used to trial a comprehensive DRS for all products and materials, including beverage cartons.

### **3. Beverage cartons to be included in consistent collection measures**

- 3.1 ACE UK remain concerned that beverage cartons are absent from the proposed core list of materials for consistent kerbside collection across the country.
- 3.2 If cartons are excluded from the future collection system it would be a backward step for the UK and would risk confusing the many consumers who are already familiar with recycling cartons at kerbside. This would run counter to the objective of improving UK's recycling system and would threaten to undermine more than a decade of investment and commitment from the beverage carton industry, which has, in effect, operated its own voluntary EPR system throughout this time, including the development of large-scale, dedicated reprocessing capacity, a price support mechanism to incentivise collection and free of charge collection where local authorities were not able to collect from the kerbside.
- 3.3 In light of this risk, and particularly given the consequences - which are already becoming apparent - of beverage cartons being removed from kerbside collections and being landfilled instead, we strongly believe that the beverage carton should be confirmed as a required item for consistent kerbside collection as soon as possible.
- 3.4 Furthermore, following the publication of OPRL's recently revised on-pack recycling labels, it is essential to provide clear guidance to both local authorities and waste management contractors that beverage cartons are fully recyclable and that they should be collected. Currently, as the extent of beverage carton kerbside collection is slightly below OPRL's threshold of 75% for the 'recycled' label, cartons must carry a label which asks consumers to check locally.
- 3.5 Without clarity, there is a growing risk that progress will be undone and that the industry's efforts and investment will be undermined.

### **4 An independent beverage carton target**

- 4.1 We strongly support the introduction of a binding beverage carton target to drive collection.
- 4.2 Beverage cartons are currently within the paper target, but we advocate removing them from paper because (a) paper exceeds its target without needing to capture any laminated fibre packaging, which is therefore not prioritised by collectors and paper reprocessors; and (b) beverage cartons should not be collected and reprocessed as part of a mixed fibre grade in any case.
- 4.3 Beverage cartons should be collected with containers, sorted and reprocessed at an appropriate facility so that all component materials can be fully recycled and the value of each can be realised.
- 4.4 A beverage carton target will encourage more collection, sorting and separation of cartons and will guide decisions on infrastructure investment. Greater separation will also enable beverage carton recycling progress to be tracked more accurately and transparently.

### **5 Incentivising use of bio-based packaging**

- 5.1 There should be greater recognition of the value of bio-based, renewable materials in working towards a circular economy. Opportunities to further extend the use of bio-based materials, such as wood fibre from sustainably managed forests, should be identified.
- 5.2 We would particularly support measures to look beyond the traditional waste hierarchy. A whole life-cycle approach to managing resources and environmental impacts should be taken, including the use of low-carbon, low-plastic, bio-based materials.
- 5.3 Between 75% and 85% of a beverage carton - depending on whether it is aseptic or chilled respectively - is paperboard made from sustainably-sourced wood fibre, a bio-based renewable material which absorbs atmospheric carbon as it grows.
- 5.4 [Life cycle analysis](#) by the Heidelberg Institute for Energy and Environmental Research shows that the beverage carton has one of the lowest carbon impacts of all drinks packaging formats.



- 5.5 As the UK transitions towards a low carbon, circular economy, it is important to recognise the role of bio-based, renewable materials and create policy frameworks which incentivise their use.

## **6 Deposit Return Schemes**

- 6.1 We support the inclusion of as wide a range of products and lightweight packaging materials as possible, including beverage cartons, to reduce consumer confusion, increase system efficiency and create a level playing field for products and packaging materials.
- 6.2 We would recommend that a DRS is not rolled out immediately, but that the new EPR system is given time to establish itself and to show its value.
- 6.3 However, we recommend that this time should be used to trial a comprehensive DRS for all products and materials, including beverage cartons.

## **7 Concluding remarks**

- 7.1 Should the Committee wish to discuss any of the points in more detail, particularly in relation to safeguarding beverage carton collection at the kerbside, we would be pleased to assist.

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