



## The UK Plastics Pact Roadmap to 2025: Refresh

### Introduction

With 18 months of The UK Plastics Pact remaining, this is the third iteration of the Roadmap to 2025. Delivering all four targets will be contingent on the effective implementation of packaging reforms along with significant investment by business. Using the latest available insight on packaging policy developments, the Roadmap sets out:

- the critical pathway to achieving Targets 1 & 4;
- the actions that need to happen by 2025 in preparation for the effective implementation of key policy measures; and
- the actions that need to be delivered in the period 2025-2030 to ensure the delivery of the final two Targets 2 & 3.

As well as guiding members and supporters, it also acts as a tool to galvanise wider action by governments, funders, investors, NGOs and businesses who are not members of The UK Plastics Pact, but without which the Pact targets will not be reached.

The draft Roadmap can be found [here](#). Please review the document and provide feedback **by COB on Thursday 12 September**.

Please note that this consultation is running alongside the Target 1 consultation as they are interlinked pieces of work.

Qus 1 – 3 are about the organisation responding to the consultation.

## Target 1: Problematic and Unnecessary Packaging Roadmap

4. Do you agree with the timeline and actions?

	Yes	No	I don't know
By end 2024	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2025	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
By end 2030	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

By end 2024: REA agrees with most of what is proposed for removal. Regarding single-use, single-serve sachets and jiggers in restaurants we have responded to the UKPP Eliminating Problematic Plastics consultation's qu 13 on this topic; the roadmap may need nuancing, thinking of how compostable sachets and stick-packs could provide solutions for some restaurants' /cafés' take-out foods/beverages and at any of their premises where reusable solutions would be impractical.

Non-NIR detectable plastic packaging: REA supports removal of such packaging (we are not commenting on feasibility of the proposed deadline of by end of 2025) and our interpretation is that NIR-detectable compostable plastic packaging would thus not be within target for removal. Our response to WRAP's Eliminating Problem Plastics consultation question 11 includes link to UCL's research paper on using hyperspectral imaging technology (not so far in a specific waste management context) that achieved high detection accuracy rates for a range of compostable plastic types. WRAP should consider revising the relevant Target 1 wording to 'Removal of plastic packaging not detectable using NIR or other commercially deployed machine technology'.

### 5. Is anything missing?

Yes

No

I don't know

If your answer to the question above was **YES**, please provide further details

'Non compostable fruit stickers': WRAP's Eliminating Problem Plastics document (v 4, Feb 2022) proposes elimination of non-compostable fruit/veg stickers and REA supports this. We guess that for brevity '/veg' was omitted from WRAP's Refreshed Roadmap to 2025. Please ensure the finalised refreshed roadmap says 'Non compostable fruit/veg stickers'.

## Target 2: Recyclability Roadmap

### 6. Do you agree with the timeline and actions?

	Yes	No	I don't know
By end 2024	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2025	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



If **NOT** please provide any changes you would like to see made and the rationale for them.

Roadmap p 6, Redesign of multi-material non-recyclable film and rigid plastic packaging ahead of Simpler Recycling: compostable versions can be multi-material (see our answer to qu 8 of the Eliminating Problem Plastics consultation). Simplest clarification would be to add a second sentence saying 'Compostable versions need not be redesigned.'

Roadmap p 6, Circular solutions identified for residual material that will not be collected and recycled at scale ahead of Simpler Recycling': it would be clearer if residual is deleted, which removes any uncertainty about whether this means also materials in residual waste streams that are not dirty-MRF-selected from those collected streams and recycled at scale.

Roadmap p 6, Removal of non-recyclable materials...non NIR-detectable..': REA prefers this is changed to 'not detectable by NIR or other commercially deployed machinery'.

Roadmap p 8, Removal of multi-material rigid packaging. Add a second sentence saying 'Compostable versions need not be redesigned.'

Roadmap p 8, Greater clarity on the recycling pathways for film: REA is supports this because its scope seems to include organic recycling pathways for compostable film, for which there are a number of B-2-B arrangements in place. In addition, compostable film used for lightweight compostable carrier bags (a packaging product format) that are last re-used as a kitchen caddy liner or food waste bin liner and where that waste stream currently goes to in-vessel composting is an existing organic recycling pathway; are these quantities of lightweight compostable carrier bags factored into the plastic film recycling figures, as a distinct sub-set? The same question applies to any compostable fresh produce bags in a format that is classified as packaging.

Roadmap p 8, Hard to recycle components designed out (metal components, non NIR-detectable components etc): we prefer the 'non NIR-detectable' is substituted with 'components not detectable using NIR or other commercially deployed machinery'. If components means ingredients or constituents in or manufactured onto the item this is not a requirement that should apply to compostable items (see our answers to qu 8 and 14 in WRAP's consultation on Eliminating Problem Plastics). Alternatively, if in this roadmap components means easily separable (e.g. by hand) parts of an item then we support designing out any non-compostable components of an item that also has one or more compostable components; this is best practice.

7. Is anything missing?

Yes

No

I don't know

If **YES** please provide further details

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Roadmap p 8, targets for each 'by end of' year: in tick boxes REA has answered that we don't know, as recyclability of non-compostable plastic packaging is not one of our core subjects. If data on compostable packaging (presumably not only compostable plastic packaging) placed on the UK market is not yet factored into data gathering, data analysis and target planning it should be factored in in future. We strongly agree that design of compostable packaging compliant with standards and certification scheme rules is achieved by the end of 2025.

## Target 2: Reuse/Refill Roadmap

8. Do you agree with the timeline and actions?

	Yes	No	I don't know
By end 2024	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2025	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2030	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If **NOT** please provide any changes you would like to see made and the rationale for them.

9. Is anything missing?

Yes

No

I don't know

If **YES** please provide further details

REA has not drafted an answer for qu 9's further details box.

### Target 3: Effective Recycling Roadmap

10. Do you agree with the timeline and actions?

	Yes	No	I don't know
By end 2024	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
By end 2025	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
By end 2030	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If **NOT** please provide any changes you would like to see made and the rationale for them.

Roadmap p 12: At least some of the points under each 'by end of [target year]' could be interpreted as including compostable packaging. However, there are some that don't appear a good fit, e.g. 'Supermarkets and brands support end market development'. End market development for composts is not a pressing need (including composts derived from biowastes that included compostable packaging and non-packaging items). However, more demand from market sectors that require mature composts could enable more composters to start feeding in compostable items (particularly in-vessel composters for compostable food-contact items). A further aspect of end market development is the prospective opening of the growing media manufacturing market to separated fibre digestate, as part of current revision of the AD Quality Protocol. This could drive more aerobic maturation of Separated Fibre Digestate (SFD) or some co-composting of SFD with other biowaste materials to produce more compost suitable for use in growing media manufacture; this could improve opportunities for organic recycling of compostable items. The roadmap's described action is okay for non-compostable packaging but for compostable packaging it should have an action of

'Multiple-stakeholders support further development of markets for composts and digestates' as an action for by the end of 2025.

Thinking beyond end markets, higher gate fees for compostables than for food wastes could aid extension of minimum composting process timescales, which may lead to more in-vessel composters deciding to feed in compostable packaging. Similarly, availability of PRN income for organic recycling facilities that feed in and break down compostable items and that are registered as reprocessors under the pEPR system could lead to more of these facilities deciding to feed in compostable packaging.

Roadmap p 12, Clarity of infrastructure capacity requirements and business case for investment: REA especially supports this if it also covers spare capacity in the in-vessel composting sector, food-waste-fed AD sector and slowly-emerging food+garden/plant-waste-fed AD sector. Given LCAs to date and the places of different organic recycling methods in Defra's and the devolved administrations' waste hierarchies, analysing the business case for UK investment in dry-AD processes with at least one composting phase would be beneficial. Benefits are a larger network of organic recycling facilities capable of on-site biodegrading compostable packaging and non-packaging items, more plant wastes from municipal sources contributing to a higher total annual production of biogas (than digesting only food wastes from municipal sources), a higher percentage of high-solids outputs suitable for use in markets beyond agriculture and high-solids outputs being less restricted in terms of suitable soil conditions for spreading on agricultural land (if used in that sector).

Roadmap p 12, Consistent collection of all rigid packaging (2026): could be interpreted as consistent collection of all non-compostable rigid packaging by end of 2026 or also as consistent collection of compostable rigid packaging by the same deadline (collected co-mingled with the non-compostable rigid packaging and with the compostable rigid packaging positively selected at MRFs for onward supply to in-vessel composting and/or collected separately from non-compostable rigid packaging). Whichever is intended, please make it clear in the finalised refreshed roadmap. If the planned action includes compostable rigid packaging the consistent aspect of this needs attention; consistent collection amongst 1) at least 75 % of LAs and/or 2) amongst businesses and other non-LA organisations that collect compostable rigid packaging and send it for organic recycling under B-2-B arrangements? We have commented on 'Tests of organic recyclability of compostable packaging' in our response to WRAP's consultation on Eliminating Problem Plastics.

11. Is anything missing?

Yes

No

I don't know

If **YES** please provide further details

## Target 4: Recycled Content

12. Do you agree with the timeline and actions?

	Yes	No	I don't know
By end 2024	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2025	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
By end 2030	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If **NOT** please provide any changes you would like to see made and the rationale for them.

13. Is anything missing?

Yes

No

I don't know

If **YES** please provide further details

Roadmap p 13, the list of progress to date: This includes 'Role of non-mechanical recycling understood working in concert with mechanical recycling'. A point for addition with a cross against it should be something like 'Role of organic recycling of compostable packaging not yet well understood and needs to work in concert with mechanical and non-mechanical recycling'. We interpret the last of these as chemical recycling.

Roadmap, p 14: the roadmap does not yet but should include that bio-based content in compostable packaging is recognised as an equivalent to recycled content in non-compostable packaging. If bio-based content is decided insufficient in some way, we would want to explore a mass balance approach for compostable packaging with a view to reform of the Plastics Packaging Tax to recognise this (similar to what the roadmap's page 13 already proposes for non-mechanical recycling output). Some detail is in the following paragraphs and REA can supply further info if WRAP requests it.

The bio-based (renewable carbon) content of compostable products can be determined by using standardised test methods, e.g. EN 16640, EN 16785-1, ISO 16620-2 and ISO 16620-4. The product and its test results can be assessed and independently verified by independent certification scheme providers, e.g. TÜV Austria or DIN Certco. **N.B.:** a product's bio-based content is assessed differently from whether it is compostable, with the relevant standards and certification schemes being different.

The REA wrote to HMRC in August 2020 when it was developing the Plastic Packaging Tax (PPT) and requested that HMRC exempts from this tax;

- '1. plastic packaging,
2. multi-material packaging that includes at least one plastic component\*, and
3. plastic product formats which are not classified as packaging but which HMRC decides are within the scope of this tax,

where the item is independently certified compliant with the standard BS EN 13432 or ASTM D6400 and which, through at least independent laboratory test services, it is proven to contain at least 30% bio-based carbon content.' \*\*

\*A component is an easily separable part, e.g. by hand.

\*\* Bio-based content can be measured using tests specified in standards, e.g. BS EN 16640:2017 'Bio-based products. Bio-based carbon content. Determination of the bio-based carbon content using the radiocarbon method.'

Had this been accepted by HRMC, any independently certified industrially compostable packaging product that has sufficient compostable plastic content (by weight) to fall within this tax's scope would have been exempt from this tax and been on a par with the minimum 30 % recycled content threshold that exempts non-compostable products with a minimum of 30 % recycled content from this tax.

A PPT exemption for the compostable products described above should be introduced asap. If WRAP agrees with this, a revised p 14 of the roadmap should include:

- under the By end of 2025 target 'minimum 30 % w/w bio-based content in compostable packaging, with the product's bio-based and compostable credentials independently certified'; and



- under the By end of 2030 target, something like 'Plastics Packaging Tax recalibrated so that in-scope compostable packaging with sufficient bio-based content is exempt from this tax'.

A less preferable alternative - if it is decided that a minimum 30 % bio-based content is in some way deficient – is to consider a mass-balance approach to accounting for organically recycled content in compostable products (those as described above).

## **The UK Plastics Pact Roadmap to 2025: Refresh**

Thank you for your feedback. We will analyse responses in September and share the updated Roadmap with you ahead of publication this Autumn.