

Food and Drink Federation meeting 19th Jan

Packaging Federation

INCPEN

From:

Sent: 18 January 2017 14:21

To:

Cc: Preston, Chris (Defra)

Subject: Briefing: Food and Drink Federation meeting 19th Jan = Circular Economy Package and Extended Producer Responsibility for packaging

Dear

With many thanks to all who contributed, please find attached the briefing and annexes for Minister Coffey's meeting with the Packaging Federation, Food and Drink Federation (FDF), British Retail Consortium (BRC) – now also including INCPEN and the British Soft Drink Association (BSDA).

This has been cleared by Chris Preston. Please let me know if you require anything further.



ANNEX1 - Joint
Letter FDF BRC...



ANNEX2 -
Ministerial Resp...

Kind regards,

| Producer Responsibility | Environmental Quality Directorate | **Department for**
Environment, Food and Rural Affairs | | Address: Area 2B, Nobel House, 17 Smith
Square, London SW1P 3JR

From:

Sent: 03 January 2017 15:29

To:

Cc: Preston, Chris (Defra)

Subject: Food and Drink Federation meeting 19th Jan = Circular Economy Package and Extended Producer Responsibility for packaging

*Sorry if you have received this twice, my emails are not sending properly today!

**PO Post Opening
Tracking Sheet**

Barcode Number



Date Post Opened



Allocated to -



Handling Instructions

Level of urgency (Please circle) -

HIGH MEDIUM LOW

Type of Case -

PO POCOn Invitation

Handle As -

Bespoke Routine Standard Factsheet

Minister signing Please circle -

LEADSOM EUSTICE GARDINER COFFEY

Lead Policy Area

(Division and policy contact, if applicable) -

Subject Line

To be entered into Contact

British Retail Consortium

Handling Instructions
For Drafter



Dr Thérèse Coffey MP
Parliamentary Under-Secretary of State for
the Environment and Rural Life Opportunities
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

28 September 2016

Dear Thérèse,

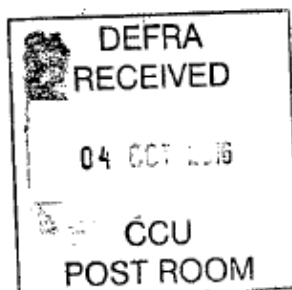
Re: EC Circular Economy Package and Extended Producer Responsibility for Packaging

The undersigned organisations represent a large proportion of the UK grocery and packaging value chain. We estimate that the combined membership of our five organisations has a turnover of around £280 billion and accounts for over 40 per cent of UK manufacturing employment.

We consider that the economic well-being of the sector could be under threat if some elements of the European Commission's Circular Economy proposals, currently undergoing co decision within the European Parliament and Council, were to find their way into UK legislation.

When it comes to meeting our obligations under the EU Packaging and Packaging Waste Directive, the UK's market-based approach to producer responsibility, in which the costs of meeting national recycling targets is shared between producers, local authorities and consumers, has given us the advantage of having one of the most efficient and cost effective packaging recycling systems in Europe. Moreover this system has consistently met the Directive targets.

However, we are very concerned about the European Commission's proposal to insert a new provision on Extended Producer Responsibility (EPR) into the EU Waste Framework Directive (2008/98/EC) and which we consider would put the important attributes of the UK's approach at risk. This proposal would require the financial contributions paid by producers within EPR schemes to cover the entire waste management costs for the products they place on the market. Costs in this case would include the costs of separate collection, sorting and treatment operations, communication to waste holders, data gathering and reporting.



Were it to be implemented in the UK, this proposal would add considerably to the compliance costs of UK producers (including UK retailers and food and drink manufacturers) under the Packaging and Packaging Waste Directive. The view of experts in the UK is that the overall cost of recovery of packaging to producers in France and Belgium is about five times that in the UK, whilst costs in Germany reach 10 times the UK amount. This could therefore see UK producer responsibility costs for packaging increase from the current average of £50 -£100 million per annum to as much as £1 billion per annum. Such a significant and disruptive change is also likely to have wider negative impacts on the overall effectiveness of the UK packaging recovery system with no net environmental benefit.

These cost increases will come on top of the existing burden of business taxation. The balance of business taxation has become increasingly weighted against people and property intensive businesses such as retail, which together with other parts of the grocery and packaging chain pays an estimated £10 billion per annum in business rates. This expenditure, which is redistributed to local councils and used to fund local services such as waste collection, is dampening local business growth and investment.

We realise that the vote to leave the EU has created a great deal of uncertainty about the extent to which the Circular Economy package and in particular the EPR proposals will apply to the UK once we leave. We are also acutely aware that this uncertainty is likely to prevail until our new trading relationship with the EU begins to take shape. The timeframe for the UK's departure from the EU may therefore go beyond the likely deadline for transposing the legislative elements of the package into national law which we understand to be two years following adoption. We believe it is therefore imperative that the UK Government continues to play a full and active role in the current EU negotiations on the package, making the case for Member States to retain flexibility in EPR implementation such that costs on producers can be kept in proportion to roles and responsibilities at the local level.

Irrespective of the outcome of the negotiations, we also acknowledge that the UK's decision to leave the EU also potentially provides us with more flexibility to meet the same environmental standards according to our own national circumstances. Whilst we accept that there are some aspects of the UK producer responsibility system that could be improved, it has, as discussed earlier, several important strengths and benefits compared to those systems adopted in other parts of Europe and remains essentially fit for purpose. We therefore do not see the case at this point in time to make radical change.

We would very much welcome the opportunity to discuss with you our views on EPR in the context of the Commission's proposals as well as the opportunity Brexit provides to review desired outcomes for UK policy on waste and the circular economy going forward. We would be grateful if you could reply to [REDACTED], FDF, 6 Catherine Street, London WC2B 5JJ or email [REDACTED] in the first instance.

Yours sincerely,

[REDACTED]
[REDACTED]
British Retail Consortium (BRC)

[REDACTED]
British Soft Drinks Association (BSDA)

[REDACTED]
Food and Drink Federation (FDF)

[REDACTED]
Incpen (The Industry Council for research on Packaging & the Environment)

[REDACTED]
The Packaging Federation

[REDACTED] Climate Change and Industry

Other correspondence relating to FDF meeting

From:

Sent: 13 February 2017 09:35

To:

Cc:

Subject: RE: PO00000421672 - PO421672 - Circular Economy & Packaging DUE DATE: 13 Feb -
Contribution due: 13/02/2017

Hi

Good point - thanks for checking. Ian Wright CBE did not attend the meeting, although the Food and Drink Federation was represented by David Bellamy.

Full attendee list as follows:

Dick Searle, Chief Executive of the Packaging Federation

David Bellamy, Environment Policy Manager, Food and Drink Federation (FDF)

Alice Ellison, Environment Policy Adviser, British Retail Consortium (BRC)

Gareth Barrett, Public Affairs Manager, British Soft Drinks Association (BDSA)

Jane Bickerstaffe, Director, Industry Council for Packaging & the Environment (INCPEN)

Thanks,

From:

Sent: 10 February 2017 18:01

To:

Cc:

Subject: RE: PO00000421672 - PO421672 - Circular Economy & Packaging DUE DATE: 13 Feb -
Contribution due: 13/02/2017

Hi

As suggested, MCU have drafted the brief response you proposed (attached).

Is someone on your team able to confirm that Ian Wright CBE was actually personally in attendance at the meeting referred to before we send it to Private Office?

Many thanks,

From:

Sent: 06 February 2017 14:07

To:

Cc:

Subject: FW: PO00000421672 - PO421672 - Circular Economy & Packaging DUE DATE: 13 Feb - Contribution due: 13/02/2017

Hi – I'm forwarding this case onto the Producer Responsibility team which deals with EPR & packaging & the EU Int team. Both had reps present at the meeting referred to in the letter. – as mentioned.

| Resource Efficiency and Circular Economy Strategy Team | Environmental Quality|
Department for Environment, Food and Rural Affairs
| | Address: Area 2B, Nobel House, 17 Smith Square, London, SW1P 3JR.

From:

Sent: 06 February 2017 12:53

To:

Cc:

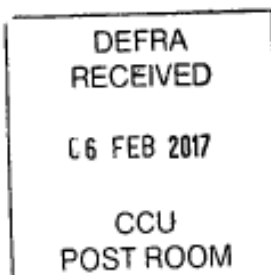
Subject: PO00000421672 - PO421672 - Circular Economy & Packaging DUE DATE: 13 Feb - Contribution due: 13/02/2017

Dear

Please could you provide me with a contribution to this letter (PO421672) about **Circular Economy & Packaging** by 13 Feb to ensure I meet the Whitehall case deadline.



Dr Thérèse Coffey MP
 Parliamentary Under-Secretary of State for
 The Environment and Rural Life Opportunities
 Department for Environment, Food and Rural Affairs
 Nobel House
 17 Smith Square
 London SW1P 3JR



1 February 2017

Dear Thérèse,

RE: Meeting on EC Circular Economy Package and Extended Producer Responsibility for Packaging

Thank you for taking the time on Thursday 19 January to meet representatives from our organisations to discuss the EU's proposals on the Circular Economy Package and particularly to hear our concerns around Extended Producer Responsibility for packaging.

We fully support your view that the Waste Directive element of the Circular Economy Package should not be overly prescriptive on EPR and that a guidance only approach is preferred. We were pleased to see that you mentioned this during the recent Westminster Hall Debate on non-recyclable and non-compostable packaging.

We were also encouraged to hear that the UK may have support on this front from Germany and Ireland. Through our respective European Associations we will endeavour to encourage the industry in some of the other key Member States to lobby for a similar approach. We will also continue to engage with UK MEPs across the political groups to make them aware of the potential impact a more prescriptive approach to EPR could have on costs for both industry and ultimately for consumers.

On the subject of deposit return schemes, we wish to reiterate that all five organisations are unanimous in the view that such a policy would seriously undermine the viability of current kerbside recycling schemes, tackle only a small proportion of littered items, impose high costs and inconvenience on consumers, and increase environmental impact. Colleagues from FDF and BSDA recently met the Welsh Cabinet Secretary for the Environment and Rural Affairs and discussed our shared concerns that DRS would have a negative effect on the successful levels of kerbside recycling there.

BSDA will respond to you separately regarding your request for more information on the life journey of a drinks can.

Thank you again for taking the time to meet us. Our organisations are fully committed to ensuring the UK is a leader in resource efficiency given our strong belief that this goes hand in hand with maximising our competitive advantage.

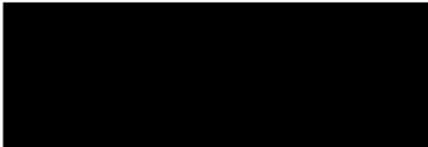
Yours sincerely,



British Retail Consortium (BRC)



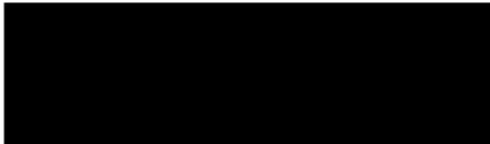
British Soft Drinks Association (BSDA)



Food and Drink Federation (FDF)



Incpen (The Industry Council for research on Packaging & the Environment)



The Packaging Federation



Climate Change and Industry





**Department
for Environment
Food & Rural Affairs**

Nobel House
17 Smith Square
London SW1P 3JR

T 03459 335577
defra.help@defra.gov.uk
www.gov.uk/defra

Dr Thérèse Coffey MP
Parliamentary Under Secretary of State

[REDACTED]
Food and Drink Federation
10 Bloomsbury Way
London
WC1A 2SL

Our ref: PO421872/BK

15 February 2017

[REDACTED]

Thank you for your letter of 1 February about the circular economy and extended producer responsibility for packaging and for the recent meeting on these issues with representatives from your organisations.

I have noted your comments and thank you for your continued commitment to these important matters.

Yours sincerely,

[REDACTED]

DR THERESE COFFEY MP



Hi there

Request for advice on this might come in while I'm away. I would recommend TC accepts, if diary allows – Alupro can talk about their work with Rolls Royce, too, given that TC missed out on a visit there?

Thanks,

| Producer Responsibility and Product Regulation | Environmental Quality |
Department for Environment, Food and Rural Affairs
Address: Apex Court, City Link, Nottingham, NG2 4LA

From:
Sent: 21 February 2017 17:25
To:
Subject: Letter

Hi

Good to see you today.

As promised, attached sent today to Dr Therese Coffey together with an infographic we have created to illustrate the "endless life of a drinks can".

Please let me know if you hear anything.

Many thanks

Executive Director



Aluminium Packaging Recycling Organisation Ltd
1 Brockhill Court, Brockhill Lane, Redditch B97 6RB

Registered in England No. 2837918
Registered Office: 90 High Street, Evesham, Worcs WR11 4EU

Dr T Coffey
Parliamentary Under Secretary of State for Environment & Rural Affairs
Department for Food & Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

21st February 2017

Dear Dr Coffey,

Recycling Aluminium Packaging – a UK success story

The Aluminium Packaging Recycling Organisation (Alupro) represents the companies that make up the UK's aluminium packaging supply chain. Funded by our members and other industry stakeholders, we run highly successful behaviour change programmes, communicating directly with consumers to boost recycling levels.

I understand that during a recent meeting with the Food & Drink Federation (FDF), Packaging Federation, British Soft Drinks Association (BSDA) and Incpen you expressed an interest in finding out more about the "life of a drinks can". For your information I have enclosed an infographic which details the "endless" life of drink cans in the UK. As you will see, nearly 70% of drinks cans sold in 2015 were recycled; and we anticipate that this figure increased further in 2016 (we are waiting publication of the final PRN numbers to allow the actual recycling rate to be confirmed).

Alupro would like to extend two invitations to you: Firstly to visit the Novelis "can to can" recycling plant in Warrington, Cheshire to see drinks can recycling first hand. The plant recycles 150,000 tonnes of used drink cans into metal from which new cans are manufactured, every year. If your diary allows we could also arrange a tour of the Ardagh drinks can manufacturing plant in Wrexham on the same day.

Secondly, we would also like to invite you to be the principal guest speaker at the Alupro Annual Members Meeting, which will take place on Tuesday 16th May at the Hilton Hotel, Wembley. I know our members would be very interested to hear at first-hand about the work that the Government is doing on recycling, resource management and developing the Circular Economy. We are currently finalising the programme, so can be flexible and work around your diary commitments with regard to timings.

We look forward to hearing from you, and hopefully welcoming to Warrington and/or Wembley in due course.

[Redacted]

[Redacted]

[Redacted]

Executive Director



Aluminium Packaging Recycling
Organisation Limited



Tel: 01527 597757
Email: info@alupro.org.uk
www.alupro.org.uk



Registered Office: 90 High Street, Evesham, Warwickshire WR11 4EU Tel: 01356 424358
Company Reg: 2837918 - VAT Reg: 627 2244 52 - Company incorporated in England

CONSUMPTION

COLLECTION FOR RECYCLING

RECYCLING



MetalMatters

every can counts

6.2 Billion Drinks Cans Recycled - 69% Recycling Rate*

*2015

THE ENDLESS LIFE OF THE DRINK CAN

THE FACTS

Can to can in just **60 days**.

Drinks cans are endlessly recyclable.

Saves up to **95%** energy compared to primary production.

Saves up to **97%** emissions compared to primary production.

7 out of **10** drinks cans in the UK are recycled.

Industry campaigns deliver **increased** recycling rate year on year.

Source: Aluminium Packaging Recycling Organisation
www.alupro.org.uk





BPF House



The Rt Hon Thérèse Coffey
Parliamentary Under-Secretary of State
Defra
Nobel House
17 Smith Square
London, SW1P 3JR

Tel: +44 (0)207 457 5000
Fax: +44 (0)207 457 5020
Email: bpf@bpf.co.uk
Web: www.bpf.co.uk

1st November 2016

Dear Minister,


We in the United Kingdom's plastics industry, like so many industry sectors, have always found it mutually beneficial if industry and Ministers have, from time to time, the opportunity for direct access and dialogue.

Coverage on plastics frequently appears in the press, not always for the right reasons and with varying degrees of accuracy and objectivity. In your new Ministerial role, my organisation, the British Plastics Federation, is very keen to invite you to visit the site one of our member firms, M&H Plastics, which is part of the RPC Group PLC, a leading global manufacturer of plastics packaging. M&H is based in Beccles, Suffolk, and we believe that this could be a very convenient location for you.

There you will have the opportunity to hear first-hand, from the industry, which is one of the largest manufacturing sectors in the UK, second only to the food and drink sector, on the progress we are making to address some of the environmental and business challenges in the post- Brexit era.

As background, the British Plastics Federation is the trade association for the UK's plastics industry, representing suppliers of raw materials and equipment, manufacturers of plastics semi-finished and finished products, and plastics recyclers. We have over 500 member sites in the UK and 180,000 people are employed in the sector.

We do hope that you are able to accommodate this visit in your busy schedule. We believe it would be a timely opportunity to secure a briefing which could prove valuable to you in your present role. Furthermore we would be very happy to have a dialogue with your office to ensure that the topics you wanted to be addressed were actually included in the briefing.


Director-General

The UK's Leading Plastics Trade Federation
Stronger Together | www.bpf.co.uk

A company limited by guarantee
Registered in Eng and No. 03262682



COCA COLA



Enterprises House
Bakers Road
Uxbridge
Middlesex
UB8 1EZ

Rt. Hon Andrea Leadsom MP
Secretary of State for Environment, Food & Rural Affairs
Department for Environment, Food & Rural Affairs
Nobel House
17 Smith Square
London, SW1P 3JR

25 October 2016

Dear Secretary of State,

Coca-Cola European Partners manufactures some of the world's most loved soft drinks brands here in Great Britain – and we are proud of our track record of growing our business in a way that is both responsible and sustainable.

As a business, we are committed to reducing the carbon footprint of our products by a third by 2020. We know half of this carbon comes from packaging. That is why we put such emphasis on reducing our packaging, ensuring our bottles and cans are 100% recyclable and investing in the use of recycled-content materials.

In fact, we are one of the few companies to have made a public commitment to use 40% recycled content in our plastic (PET) bottles by 2020. And we are achieving this ambition through a long-term partnership with Evolve Polymers, a reprocessing company based in Lincolnshire. Our original support for Evolve stemmed from a desire to play a positive role in creating a genuine, and sustainable, circular economy for PET bottles here in Great Britain. When it opened in 2011, the Evolve facility doubled the total amount of plastics reprocessing capability in this country, building a national infrastructure and signalling confidence in the British market.

We are proud to take this leadership on recycled PET. We equally recognise there is more to do – we think there is a significant opportunity to work with government, NGOs and industry in helping to create and build a genuine circular economy. This is about bringing the best of what we collectively contribute to the debate, to establish not only progressive environmental practice, but actions that benefit the wider British economy.

With 70% of our products consumed in the home, we welcome wholeheartedly your Department's work to boost household recycling through the creation of a more consistent approach to the systems put in place by local authorities. This is a commendable first step and, in the long run, will improve the quality and quantity of recycled plastic available for



Enterprises House
Bakers Road
Uxbridge
Middlesex
UB8 1EZ

companies to use in their packaging. We want to work with your Department in accelerating this progress.

We also see the opportunity in reform of the existing packaging producer responsibility regime -Packaging Recovery Notes or PRNs - and how it can work better to support the recycling infrastructure, consumer communication and anti-litter initiatives. We are happy to explore all potential options.

I would welcome an opportunity to discuss our thinking and how we can bring together NGOs and forward-thinking businesses like ours to work on the solutions to these challenges.

Yours sincerely,



Coca-Cola European Partners GB



Department
for Environment
Food & Rural Affairs

Nobel House
17 Smith Square
London SW1P 3JR

Dr Thérèse Coffey MP
Parliamentary Under Secretary of State

T 03459 335577
defra.helpline@defra.gsi.gov.uk
www.gov.uk/defra

Our ref: PO415451/MP

[REDACTED]
Coca-Cola European Partners GB
Enterprises House, Bakers Road
Uxbridge
Middlesex
UB8 1EZ

16 November 2016

[REDACTED]

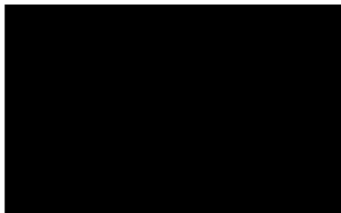
Thank you for your letter of 25 October to the Secretary of State outlining your interest and ambitions about recycling, producer responsibility and reducing the carbon footprint of packaging. I am replying as the Minister responsible for this policy area.

The Government supports all efforts to increase recycling and the use of recycled materials in manufacturing as part of a circular economy for the UK. While it is for local authorities to lead on arrangements and initiatives regarding household recycling, I agree about the importance of good communications with householders to improve the quality of recycling, as well as reduce the uncertainty about what can and cannot be recycled.

We will be consulting widely on our plans for resources, waste and recycling in developing our 25 Year Environment Plan and I welcome the contributions of the Coca-Cola European Partners to this important work. I am also grateful for Coca-Cola European Partners' involvement with our national anti-litter campaign which is being developed under the forthcoming Litter Strategy for England; and for the research your company has done on reducing litter. I hope that Coca-Cola European Partners will continue to support these and other initiatives to reduce litter such as the Great British Spring Clean.

I look forward to working with you over the coming months.

Yours sincerely,



DR THERESE COFFEY MP

