



AVA Response to the Welsh Government Consultation: Beyond Recycling

Introduction

The Automatic Vending Association (AVA) is the trade association of the vending industry, representing machine and ingredient manufacturers and suppliers, cup manufacturers and vending machine operating companies throughout the United Kingdom.

The UK vending and unattended retail industry has an annual turnover of £1.6bn. It is an industry employing 24,500 people directly, which is supplemented by those employed within the wider vending channel supply chain. AVA members operate over 460,000 vending machines, vending food, soft drinks, water coolers, hot and cold beverages and snacks.

Vending operator companies, those who provide, fill and maintain vending machines, are, with one or two exceptions, small or medium sized enterprises, often family owned.

What sets the vending industry apart from other industries is that the products are consumed close to the point at which they are purchased. This makes it easier for consumers to return cups for collection, consolidation and reprocessing.

The AVA has spent a great deal of time and resource on recycling for more than 25 years, originally with polystyrene cups with Savacup and more recently on the recycling of paper cups. In both cases we followed the process from collection of the used cups to the use of the recovered material. Paper cups are now being reprocessed into a range of products and there is enough capacity in England to reprocess all material collected in the UK. Reprocessing plastic has not been so successful and a number of companies reprocessing plastics have failed as much as anything due to the way governments have waxed and waned in their enthusiasm for recycling. The Remarkable Company is still going in a somewhat reduced form but others, including the Closed Loop HDPE plant and Boomerang Plastics have gone, although the Closed Loop plant has been reopened by Veolia. This points to a need for reprocessing to have a central role in the thinking of governments. The commercial market value of recyclate materials, both plastics and non-plastics, will be underpinned with the introduction of the Plastics Tax and Extended Producer Responsibility, so creating long term material values, and lessening the dependence on direct day to day Central Government involvement.

The vending industry has always tended to reuse parts and to refurbish machines to extend their working life. Operating companies have always kept working parts from machines that are being scrapped so that these machines tend to be empty boxes. They then use these parts to extend the working life of their machines. On the other hand, there are a small number of companies which take entire machines and refurbish them so that they can serve another 10 years. Machine manufacturers have made considerable advances in energy efficiency in the past 10 years so there is a balance to be struck between extending the working life of existing machines and upgrading them to be more efficient. The AVA was a leader in the preparation of the standard for measurement of energy consumption and the Ecodesign and Ecolabelling Regulations.

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Question 1: Are the suggested actions the best way to help us recycle more?

The AVA welcomes the Welsh Government's suggested actions to support its ambitions to become the world leader in recycling. We particularly welcome plans to develop additional infrastructure and a revised collections blueprint, which ensures all high-quality recyclable material is captured for recycling. With respect to paper cups, the high-quality wood-fibre used can be recycled up to seven times into different products before it loses its strength.

It is important to highlight therefore that the challenge remains ensuring collection of paper and plastic cups and delivery to the appropriate recycling facilities. The debate is not about whether the product is recyclable or not. Indeed, paper tea and coffee cups most recently secured a specialist recycling label from OPRL to prove that they can be recycled.

To deliver the increased rates of recycling requires the collection of waste materials in clean, quality waste streams from all points at which the use of the materials finishes, in domestic situations, in business and industry, and away from home on-the-go.

Citizen understanding of the value of individual waste materials is key, disciplined disposal in appropriate bins, consistent bin infrastructure, consistent waste materials collection, expansion of waste collection beyond household and household recycling centres are all key in delivering the ambition.

Domestic waste collection in Wales has already developed progressively in response to continued Welsh Government investment and provides for consistent collection of key waste categories of paper, plastic, metal and glass in the majority of Welsh Local Authorities. The Consultation continues to put domestic waste collection at the heart of activity driving towards zero waste by 2050. This appears to be to be the detriment of activity and focus in business and industry, and waste collections away from home "on-the-go".

In contrast to domestic and on-the-go waste streams those in business and industry are frequently "closed loop" environments serviced with business waste provision. In vending, products are typically consumed within the same premises as the vending machine, and often directly beside it. A single use beverage cup used in vending is therefore much less likely to end up outside a building and littered. The cups are easily collected and directed into recycling waste streams.

Driving continued growth in recycling requires extending the best practice of domestic practice into the business and on-the-go the environments

The consultation "Increasing Business Recycling" at the end of 2019 planning for the consistent waste collection of waste streams commensurate with those in domestic collections, to recognise that the inclusion of "household like waste" is a necessary next step in delivering net zero waste. Creating the same mind-set in the citizen at home and at business to behave in the same way with any waste material, to become habitual. Yet there is no reference to the previous consultation or any indication to it being integrated within this theme.

Simply managing collection of waste materials in domestic and business environments fails to manage the waste arising from the many sources away from home, on-the-go, with many of the

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materials in themselves having value and opportunity for repeated use. There are examples of collection models already used to recover – like batteries/WEEE – where retailers have a “take-back” responsibility and introduce post-consumer waste materials and used products to appropriate recycling streams.

Citizen awareness, behaviour and infrastructure are pivotal in the achievement of increasing recycling rates.

Extended Producer Responsibility will deliver direct funding to infrastructure, and industry is agreed in its support of this. EPR will also provide the funding to the citizen awareness of littering, materials value and recycling.

Compatibility of the Welsh recycling programme alongside the introduction and development of EPR will deliver the maximum net benefits.

Question 2: Should recycling arrangements across Wales be consistent?

Yes. The AVA is concerned that industry recycling efforts will be undermined if they are not coupled with consistent collection of paper and plastic cups across the board, from on-the-go bins to kerbside, business and retail collection. Regardless of the devolved, combined or local authority. We would like to see more, standardised recycling bins in public places, from high streets to stadiums and transport hubs to festivals, so all parties in the supply chain have a clear understanding of where they can recycle their cups.

The ease of use and interaction with recycling provision are fundamental to citizen engagement, and therefore consistency is critical. Recycling arrangements should be consistent not just across Wales, but across the UK, as citizens are highly mobile and should be able to expect the provision of consistent collection of all core waste in all Home Nations. Ultimately, this will drive improving post-consumer segregated disposable of waste materials, their collection in improved quality waste streams and reprocessing to new use.

There is currently a range of collection and recycling provisions, differing dependant on the point of use application. Nevertheless, uniformity and consistency should always be clear and apparent.

If domestic waste collection and recycling is, as appears to be the case for Welsh Government, to be considered the benchmark point of comparison for developing recycling, then this has to be the start point for the determining the materials to be collected and recycled through other channels with waste arising. To allow the learning, understanding and awareness the citizen has into new disposal/collection and recycling scenarios.

The citizen at home has time and opportunity to learn the process and protocol required of them by their local authority to ensure their waste is managed and recycled, they can do this in a timely manner that suits everyone.

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However, those same timescales are not necessarily present in other situations. In the case of waste disposal when the citizen is on-the-go the decision process on what waste to dispose of where and how can take as little as two to three seconds. To compromise the citizen's intended actions to dispose of waste material in the correct and responsible way through lack of consistent materials collected, or bin infrastructure invites contamination of another waste stream, or worse still, littering.

To maximise consistency of collection, we urge the Welsh Government to also consider the following suggestions, which we believe will be pivotal to developing a longer term, more comprehensive solution for all coated paper board, including paper cups, and ultimately ensuring greater capture of recyclable waste:

- Full inclusion of paper cups within the paper and card recycling stream, as they remain the most sustainable and hygienic option for on-the-go hot drinks. It should also be noted that as a direct consequence of industry intervention, paper cups have now become one of the highest valued materials on the market, thus making them commercially attractive to collect. Continued omission of paper cups from the normal paper and card recycling stream would therefore reduce the value we get from our resources and resource efficiency.
- Consistent labelling of recyclable materials, so that the consumer has clear information on how and where materials including paper cups are recycled, from public places to kerbside.
- Removal of some of the artificial barriers currently in place within the recycling industry which are hampering our ambitions to reach higher recycling rates.

Wales will be beneficiary of funding due under EPR as this is introduced from 2023. This will require consistency of materials collected and transparency to the funding provider businesses in scope of EPR. This will require collection consistency, and will also drive towards UK consistency, greatly benefiting the citizen.

There must be complete and overt familiarity with material acceptability, messaging surrounding bin signage, colourways used to identify given bins for given material types.

This standardisation and consistency cannot be driven by the capabilities in Materials Recycling Facilities, nor existing local authority waste contracts, this must be driven through the Extended Producer Responsibility programme.

Question 3: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

In broad outline the themes expressed are of the order. But there has to be complete alignment with the forthcoming EPR scheme.

The targeting of local authorities is necessary to measure the progress to success, but also to understand the baseline in the first instance. To be able to compare performance in aligned

authorities where population and geography are similar. There is a risk that measurement is taken to be a yardstick for success and failure, this will become particularly relevant in the provision of revenue arising from the EPR funding. Whilst this funding can only be extended where targeted expectations are realised there must be scope within the process of measurement to ensure under-achieving authorities push to deliver success.

The expansion of collectable materials is a “given” in the ambition to achieve zero waste. Collaborative development of infrastructure to accommodate new materials, to be collect consistently, and to be recycled in Wales, alternatively within the UK, is fundamental. There is no recognition of household like waste within the theme, this is significant, particularly within the scope of on-the-go consumption and waste arisings.

There is no understanding given to the management of litter, and again EPR will deliver funding to develop citizen messaging and the collection of litter. There is a shared responsibility in litter reduction to whith the citizen has a central role.

Question 4: What actions could we take to further promote the work on prevention and re-use that occur in our communities?

The issues surrounding the reduction of food waste lie outside the direct scope of the AVA. Nevertheless, our view would be that food waste reduction is a key global issue in its own right. Actions by Welsh Government to manage the reduction of food waste is a necessary aspect of Welsh Environmental Policy.

There are significant potential consequences to increasing food waste and food safety in the headlong drive to remove all forms of single use packaging in the preparation and distribution of food. Packaging enhances shelf life, ensures safety and hygienic handling of food. Enables compliances with legal standards in labelling, provides guidance on use.

The packaging protecting food has, in the significant majority of instances, a lower carbon footprint than the foodstuff being protected.

Packaging is also the enabler for the provision of food in high street and on-the-go service now an intrinsic part of daily life. But this “café culture” lifestyle is changing as the coffee shop become the new pub, the new venue of choice as a meeting point, community centre and hub, driven by the downsizing of housing and accommodation, small flats, lack of kitchens, no gardens.

The Covid-19 pandemic has demonstrated the essential need for packaging in all material formats to ensure the continued availability of healthy, safe and hygienic food and beverages

Supporting prevention and reuse, prioritising the purchasing of wood, and recycled content are worthy initiatives in the pursuit of circular environmental and economic actions.

In terms of refillable food and beverage packaging there are significant issues to be addressed in terms of health, hygiene, cross contamination, and liability to the consumer.

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Awareness and education – The Welsh Government is no different from other bodies in its obligation to promote evidence-based understanding of the benefits of packaging to promote the protection and delivery of food, instead, packaging has been allowed to become demonised which will have the opposite effect and increased food waste

Packaging also communicates – allergens, ingredients, dietary requirements, and cooking requirements. Consumer understanding of all of these prevent waste.

Refillable use requires education, and whilst there is a place and use for them, to expand this wholesale requires guidance, operational guidelines and best practice, and possibly regulations. This is equally applicable to the containers and vessels to be used as it does to the food and beverages to be served in this way. There is real opportunity to cause serious illness.

Question 6: What do you think are the key steps that we need to take to further reduce food waste?

Operator members of the AVA are acutely aware of the need to minimise food waste and manage their food machines to this end, in collaboration with their clients. Products from machines are bought for immediate consumption while much food is bought for subsequent consumption which can lead to waste. Helping consumers plan their purchases better and clarifying the difference between “best before” and “use by” dates would decrease the amount of food wasted. As the majority of waste food is bread, it may be useful to consider how to collect bread separately.

Question 7: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

The inclusion of recycled content in plastic materials in contact with food could potentially have unintended consequences in terms of hygiene, safety and cross contamination of food. Food contact legislation which governs the safe use of plastics packaging could prevent the use of recycled materials. Regulation 1935/2004 requires that materials and articles intended for contact with food shall be manufactured in compliance with good manufacturing practice so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could endanger human health.

It is essential that the implementation of any strategy resulting from this consultation is consistent so that the desire to reduce packaging does not impact food waste. It is also important that any requirements for reuse of plastics consider the food safety and economic implications of the actions. In regards to the reuse of plastic food packaging back into food packaging there are currently food safe processes for only two materials, clear PET bottles back into PET bottles and HDPE milk bottles back into milk bottles. There should be support for the development of other reprocessing technologies at an appropriate scale.

Question 8: Are the material we have listed ones we should focus attention on?

Upon what scientific basis and evidence have the identified materials been selected. Full LCA analysis is necessary if unintended consequences are to be avoided at the behest of switching from current materials in use to alternatives.

Fibre based and barrier coated foodservice packaging is already low carbon, and is frequently considerably so as compared to the product it contains. Greater use of wood-fibre based packaging materials can play a significant role in the Welsh Government's aim to decarbonise supply chains. Paper and paperboard used for packaging such as paper cups have excellent environmental credentials; it is natural, recyclable and comes from an infinitely renewable source and produced in a sustainable manner, for every tree harvested, 3-4 new tree seedlings are planted to ensure continuous growth of the forest. Furthermore, as young trees grow, they act as a carbon sink, absorbing CO² from the atmosphere, which stays in the fibres even during recycling.

Therefore, favouring packaging products made from renewable sources has many benefits including carbon capture and storage. Indeed, independent analysis shows that in most on-the-go scenarios, a paper cup has the lowest carbon footprint. The findings also confirm that paper cups also account for just 4% of the climate impact of takeaway coffee, and that when recycled their carbon footprint falls by 54%.

Bioplastic - presumably plastics made from growing material - is still plastic, and if it is to be compostable can this be assured within Wales especially given the focus on management of the increasing burden of food waste. In addition, from what source material the bio-plastics are derived, to be sure it does not impact on food supply.

Bioplastics are not necessarily more climate friendly than those made from fossil fuels. Life-cycle analysis should guide the selection of material. There is much opinion, supposition mis- and partial – information in this area and the Welsh Government could lead in the presentation of data from solid evidence.

The introduction of EPR will bring with it a materials focus; any materials focus outside of this must be consistent to avoid any conflicts in infrastructure and priority. Any preferred materials in use must also be supported through collection and recycling infrastructure, this materials within scope of EPR shall deliver funding to this end.

Question 9: Are design changes in products using the materials listed an area to focus on?

The vending industry tends not to use complex mixtures of different materials in its products.

The materials from which vending machines are made are designed to be reused and cups consist of material that is easily recycled.

Questions 10: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy? Are there other materials we could focus on and why?

Within the consideration for the recycling of plastics, replacing the use of wood in application where wood is prone to degenerate, as alternative materials in the provision of garden and park furniture, for use in damp conditions where wood would rot.

Question 11: Is our focus on improving resource efficient procurement within the Public Service a priority area?

The support declared by Welsh Government to work alongside DEFA to deliver a consistency in EPR and DRS is to be endorsed and supported. The opportunity afforded by a uniform UK wide EPR system will deliver multiple benefits over and above those of a fragmented nation specific or nation augmented system.

But the demonising of single use items and packaging without science or evidence will result in unintended adverse consequences. Packaging is also the enabler for the provision of food in high street and on-the-go service now an intrinsic part of daily life. This “café culture” lifestyle is changing as the coffee shop become the new pub, the new venue of choice as a meeting point, community centre and hub, driven by the downsizing of housing and accommodation, small flats, lack of kitchens, no gardens.

EPR will deliver funding for citizen awareness and management of littering. Creating an understanding of the value of materials in recycling. Citizens also have a role in management of litter than requires their understanding of given material values, and ease of access to bin infrastructure on-the-go – EPR will be the provider of these funds, and provision of this infrastructure a requirement of those fund providers.

The Covid-19 pandemic has demonstrated the essential need for packaging in all material formats to ensure the continued availability of food and beverages in a safe, hygienic and free of contamination...

With the introduction of EPR, product specific bans and charges are neither proportionate nor fair. The “ground-breaking” charge on plastic bags introduced by Wales has driven a fourfold increase in the use of plastics in bags for life, that are not recyclable end of life.

We support the focus on improving resource efficient procurement within public service. The vending industry has been driving down energy consumption for many years.

Question 13: Are the suggested actions in this theme the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

The AVA does not support the use of taxes or charges on paper or plastic tea and coffee cups. Indeed, it is estimated that a tax could wipe £819million from the UK economy. Furthermore, in its most recent consultation on the design of the plastic packaging tax, HMRC has suggested that paper cups are excluded from the scope of such a tax. We agree that the best way to address the use of multi-material packaging is through a revised EPR system for packaging, and we would encourage the Welsh Government to follow a similar path.

Not only is this a logical approach, it also guards against a tax which would hinder greater use of use of sustainable, lower carbon packaging such as coated paperboard. This is critical because as the supply chain within the food and drink looks to move towards more sustainable options, we urge the Welsh Government to ensure that it creates an environment in which wood fibre based materials can flourish and that the valuable fibre from these materials can be recovered and used in new packaging applications to deliver a truly circular economy

We would agree that refillable cups are a viable solution to regular drinks service, but would highlight the need for guidance on the requirement of cleanliness of the vessel to prevention cross contamination of bacteria and compromising of safe hygienic service

Furthermore, whilst we recognise that reusable cups can be an attractive alternative option, it is equally important to carefully consider the material of a reusable cup, its own initial impact on carbon emissions, its origin and that of its material, and the end-of-life solution for it such as whether it can be recycled or its potential to release micro-plastic.

We do not support the ban on disposable cups from stadia in Wales. It is perfectly for these valuable and high-quality materials to be captured for recycling and continue to drive a nascent second life industry given the provision of appropriate infrastructure as industry has demonstrated. The benefits of single use cups have been demonstrated in the current situation, and the benefits of cups that are neither heavy nor dangerous when broken have been shown in social situations over several years. Rather than ban single use cups entirely, we believe it would be better to ensure that all cups are recycled. Recycling and reprocessing facilities are available extensively throughout the UK.

We have seen the efforts of organisation to go “plastic free” which have resulted in the provision of energy expensive solutions such as the import of cans of water from Austria and believe that it is necessary to balance the risk of littering, the carbon footprint and the ease of recycling and reprocessing in order to find the optimum solution.

Question 14: Is our continued business support to make them more resource efficient a priority action?

The AVA supports the encouragement of business to become more resource efficient. However, the identification of what this means in practice should be based on evidence rather than opinion or supposition. As the example of the water from Austria shows, enthusiastic pursuit of an aim, without considering its broader context, can lead to actions which are not climate friendly.

Question 17: Are the initiative actions mentioned here those we should aim to provide supporting infrastructure for?

There is a danger of conflict between Welsh objective described in this section and those developed through implementation of EPR – we need consistency, and commonality, there will not be enough funding for both.

Within the initiatives highlighted there is an apparent lack of definitive direction for managing infrastructure and collection of waste from On-The-Go. Those business contributing to EPR operating in the high street marketplace will rightly expect those funds to be directed to that end.

Consistency in business and Industry waste, including household-like waste, to be based upon what range of materials? Wales has achieved enviable domestic waste collection success, and through the Blueprint could extend this to business and industry, to maximise the benefits in recycling the consistency in waste collection will need to be dovetailed with the outcomes of EPR.

EPR will drive all packaging towards materials that are recycled, and this should be the basis of Welsh Government driving local authorities to collect the target materials and deliver effectively to reprocessing facilities

The AVA supports the initiatives identified in this consultation. Evidence-based consistent messaging across all sectors, education of the consumer and development of infrastructure to reprocess materials are vital to the achievement of the aim of reducing landfill to zero.

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