Position Paper

Consistency of Collections

Improving the quality of Paper for Recycling

1. Summary

The Confederation of Paper Industries (CPI) campaigns for improvements in the **quality of Paper for Recycling** (PfR). Adopting a consistent, standardised, quality-focused collection regime for household collections would create benefits through the supply chain. Such a move will reduce public confusion about what can and cannot be recycled, and deliver higher quality, higher value recyclate for local authorities, waste collectors and reprocessors. CPI believes that collection methods are a key element in achieving high-quality recycling, and sees little point in standardising the list of recyclables collected at kerbside if the process then renders materials unusable by cross-contamination.

Consideration therefore needs to be given both to <u>what</u> is collected and <u>how</u> it is collected. Collection methodology is critical, with a dual bin approach a necessary minimum requirement, allowing **paper and board to be collected separately**. Developing a Quality Culture is the only way to achieve future recycling targets whilst increasing the quality of recyclate entering the waste stream, educate citizens about the value of resources. and support the transition to a circular, resource efficient economy.

2. Policy background

In February 2019, as part of the Resources and Waste Strategy for England[1] issued in 2018, Government outlined its intention to make significant reforms and opened a consultation on Consistency in Household and Business Recycling in England, Deposit Return Schemes (DRS) in England, Wales and Northern Ireland, and on Reforming the UK Packaging Producer Responsibility System. These Government consultations were a precursor to a once in a generation opportunity to change recycling systems and recalibrate packaging design. CPI responded to these consultations, supporting proposals for the collection of a core set of materials at kerbside and suggested that **high quality of recyclate can only be achieved through separate collections of paper and card.**

In March 2021, based on feedback from the 2019 consultation, Government confirmed its preferred approach to several reforms, updated previous proposals and sought views on the implementation of the preferred approaches. Government proceeded with a second round of consultations on proposals to move to Extended Producer Responsibility (EPR), introduce consistent collections, and a Deposit Return Scheme. CPI's response reaffirmed the Paper Industry's position; the industry was generally supportive of the proposed initiatives which have the potential to improve both the volume and quality of materials, especially Government's proposal to collect paper and board separate from other dry recyclables. One issue that emerged from the Consistency of Collections consultation was the **absolute necessity for the UK collection system to produce a high-quality output** and adapt collection systems to achieve this.

At the time of writing, the Government response to the Consistency of Collections is pending, although proposed reforms on EPR and DRS were published in March 2022 and January 2023 respectively. The EPR response outlined an ambitious target of 89% for paper and card recycling to be achieved by 2030. Although the Paper Industry welcomed this ambitious target, the challenge of increasing the quality of recyclate entering the waste stream should not be overlooked. For the 89% target to be realistic and achievable, it needs to be supported by effective and efficient collection systems. **Unless source-separated recycling collection systems are employed to ensure a high-quality output, the issue of contamination will undermine recycling efforts.**

Government's response on DRS confirmed that glass bottles will not be captured by in-scope in England and Northern Ireland. Although the impact of this decision will be determined once the Consistency of Collection response has been announced, if glass and paper were to be collected in the same container, that would pose a huge challenge to the Paper Industry.

[1] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

cpi confederation of paper industries

Kingston House, Lydiard Fields, Swindon SN5 8UB, Phone: 01793 889600
Web: www.paper.org.uk Email: cpi@paper.org.uk

Thus, to achieve an 89% recycling rate, the range of fibre-based packaging UK's paper mills can process should be increased and the UK mills need to be able to develop an economically viable way to process harder to recycle fibre-based materials. Therefore, to support and incentivise this action, there is an urgent need for **Government to provide funding streams and a stable regulatory regime through separate collections which will ensure high-quality recyclate.** Such a move will also attract investment in paper manufacturing to the UK, as it will provide reassurance to investors that they will receive the financial returns they require. Moreover, packaging producers who will be funding recycling collection systems expect that optimum collection systems are implemented to ensure high recycling rates and high-quality output.

The current situation and Technically, Environmentally, Economically and Practicable (TEEP) assessments do not encourage adoption of separate collections and very few local authorities have modified their recycling collection methods as a result of TEEP. The absence of statutory guidance, including the frequency with which "necessity" and TEEP assessments should be conducted, and lack of definition of 'quality' in recyclate, creates gaps and makes the credibility of the process questionable and open to criticism.

The UK's Paper-based Industries believe it is time that the **Government shows leadership and implements consistency via separate collections**, whilst providing funding and support to local authorities towards the transition to a standardised collection system.

3. Paper Industry experience

The UK's Paper-based Industries rely heavily upon Paper for Recycling as its raw material. In 2022 nearly 2.8 million tonnes of the 6.7 million tonnes collected in the UK was consumed in domestic mills, and the remainder was sold into the global commodity market. **The UK has a significant surplus of recovered fibre for recycling,** and to secure export outlets, we need to ensure it is of the highest quality and we have recovery systems in place that deliver a high-quality raw material to reprocessors.

Over the past decade, a combination of increasing adoption of commingled collections, changing global markets and poor policing of the Material Recycling Facility (MFR) Code of Conduct contributed to a decline in the quality of post-consumer PfR being delivered to UK paper mills. Escalating waste disposal costs have also placed a further burden on paper producers, who find themselves taking responsibility for the failure of the supply chain.

At the time of writing, the Government continues to develop its proposals for consistent collections. **Unless there are interventions to increase the quality of Paper for Recycling, there is a risk of disinvestment in the UK paper production and recycling infrastructure, coupled with an inability to sell a contaminated recycling product into global markets**. Consequently, this will create a landfill and incineration challenge that will undermine the achievement of the UK's carbon targets and render as "waste" materials that should be a pillar of the circular bioeconomy.

4. The opportunity to increase quality

Promoting the proper separation of materials at source will help the transition towards a circular, resource efficient economy. As pressure on global resources increases, it is important we take the opportunity to fully utilise secondary commodities. Commingled collection has had its day. The advent of circular economy and sustainability must drive new behaviours, with all parts of the supply chain taking responsibility for the quality of material delivered back to the resource loop. **Consistent collections could provide a low impact mechanism to change consumer behaviour and improve raw material quality.**

Global market changes, combined with the proposed legislative reforms, offer the opportunity to create favourable conditions to improve the quality of Paper for Recycling. Producers of packaging are subject to a new regime of EPR, which will encourage better design for recyclability and collection of high-quality recycling. The Government's commitment to cover the costs of national changes to household waste can lead to more funding for local authorities to improve their recycling collection systems. Revenue from EPR can potentially support council recycling schemes to implement source-separated collection systems and address better quality.

Finally, there is an indication that Wales will introduce regulations to ban commingling and a requirement for paper & board to be collected separately. The Welsh Collections Blueprint[2], where the Welsh Government stated its preference for councils to use a kerbside-sort approach, is an exemplar of what can be achieved with

[2] https://gov.wales/sites/default/files/publications/2022-04/municipal-sector-plan-part-1-collections-blueprint.pdf

the right balance of investment and intervention. As a result, Cardiff, one of the few councils in Wales that collects commingled material, is set to expand the rollout of separate recycling collections across the city. Although the majority of Northern Ireland (NI) councils operate commingled recycling collections, the recently launched "Keep Recycling Local"[3] campaign calls for separate collections to improve quality and reduce contamination.

5. Paper Industry position

CPI has worked extensively within the Paper Industry and supply chain to determine recyclability in a definitive and credible way. We have recently established Papercycle[4], a tool which provides the product design assessments required to deliver increased recycling. This work, combined with the CPI Design for Recyclability Guidelines[5], which point the way towards resource efficient recycling and make fibre-based products recyclable by design, put the Paper Industry in a leading role in defining standards.

Undoubtedly the Paper Industry has intensified its efforts to increase the **quality, range** and **quantity** of Paper for Recycling, whilst motivating sustainable design and improving the recyclability of the more challenging materials. However, to ensure a high-quality output the Paper Industry seeks the following:

- Government to establish a r**obust regulatory regime** which:
    - Mandates the adoption of source separated collection of paper and board at kerbside (minimum requirement dual stream collections); paper and board should be collected separate from other materials and NEVER be collected with glass and flexible plastics; and
    - Provides funding to local authorities to support a smooth and quick transition to a source-separated collection system.
- Government to provide **funding** streams to support and incentivise the reprocessing of harder-to-recycle fibre-based materials and increase the range of fibre-based packaging UK's paper mills can process.
- Place a specified **limit on contamination** in contracts for kerbside collected post-consumer PfR. This should be to levels demanded by EN643, but with an initial derogation to 5% where waste is marketed specifically "for further sorting".
- Although separate collections would ensure that MRFs are not required to process Paper for Recycling, in the event a TEEP exemption is granted the Paper Industry expects improvements in MRF operations and thorough **inspections** to verify MRF material sampling regimes and stated quality results. At the same time, Government should urgently review the current necessity and TEEP regime, produce official guidance and provide a standardised analysis method to ensure consistency in the results and credibility in the conclusions.

Further Information

Further information is available from Dimitra Rappou, CPI Director of Recycling, email drappou@paper.org.uk

Confederation of Paper Industries

- The Confederation of Paper Industries (CPI) is the leading trade association representing the UK's Paper-based Industries, comprising recovered paper merchants, paper and board manufacturers and converters, corrugated packaging producers, and makers of soft tissue papers.
- CPI represents an industry with an aggregate annual turnover of £11.5 billion, 56,000 employees, and supports a further 93,000 jobs in the wider economy.
- For facts on the UK's Paper-based Industries please visit: www.paper.org.uk

[3] https://keeprecyclinglocal.com/campaign/

[4] To provide a definitive answer on the recyclability of a packaging product, CPI has established Papercycle, a wholly owned subsidiary of CPI. Papercycle is an online tool which assesses recyclability and delivers verification and certification services for fibre-based packaging. Papercycle determines whether fibre-based packaging formats are recyclable in the UK, and which types of mills can reprocess them. Papercycle also offers recyclability assessments for product development for any suppliers and designers who want to test a product before its launch.

[5] CPI has published its revised Design for Recyclability Guidelines, which express the preferred position of the Paper Industry based on practical experience and are intended to provide broad direction and point the way towards resource efficient recycling of fibre-based packaging products. The Guidelines aim to optimise the recyclate entering the supply chain, but also to stimulate further innovation and technological developments in packaging materials and provide a direction of travel for future packaging design within the context of sustainability and resource efficiency.

REVISED: MARCH 2023