

CTPA Feedback to House of Commons Inquiry on Plastic Waste

03 September 2021

CTPA would like to thank the House of Commons Environment, Food and Rural Affairs Committee for the opportunity to contribute to the inquiry on Plastic Waste.

CTPA is the trade association representing the UK's cosmetics industry. Membership covers 80 - 85% of the UK cosmetics and personal care market by value, and comprises small, medium, large and multi-national companies supplying the UK market. Companies include manufacturers, distributors, contract manufacturers and own brand retailers.

CTPA and its members are fully committed to the UK Government's objective to deliver a truly circular economy, including incentivising better design of products and enhancing meaningful collection and reprocessing of materials.

Packaging plays an important role for cosmetics and personal care products, from displaying legal labelling requirements, enabling suitable application, and dosing of product to offering protection during transportation and enhancing the retail presence on shelf.

CTPA, in addition to some of its members, has contributed to the many consultations to arise from the UK Government Resources and Waste Strategy. CTPA also works with the Industry Council for Packaging and the Environment (INCPEN) and other sector associations to harmonise responses where applicable.

1. What measures should the UK Government take to reduce the production and disposal of single-use plastics in England? Are the measures announced so far, including a ban on certain single-use plastics and a plastic packaging tax, sufficient?

CTPA supports the Government's efforts to create a more circular economy by encouraging better use of resources, such as plastic in packaging and maximising the collection and recycling of waste to high quality recyclate. It is CTPA's view that the intention of the Government's strategy, to increase the quantity of high quality recyclate and drive innovation towards more sustainable packaging, is positive and can be achieved by introducing increased contributions from producers, in the form of Moderated Fees through Extended Producer Responsibility, improving or mandating consistency in labelling and harmonising the collection of waste to maximise the potential for consumer behavioral change.

The UK cosmetics and personal care industry is a responsible industry which is fully committed to reducing its environmental impact. Packaging forms part of a regulated product. Cosmetics manufacturers try to strike the right balance between a product that is protected for use over several months or even years and minimising packaging. By working with packaging manufacturers, brands and retailers, solutions are being sought to increase the sustainability of packaging and maximise meaningful collection and recycling.

Wherever possible, the industry will innovate and adapt in order to use packaging with a lower environmental impact and which is therefore not subject to the tax. However, the strict safety requirements necessary for cosmetics and personal care products and packaging mean that the detailed composition of the packaging must be known and so in some cases, recycled packaging cannot be used. In such cases, the Plastic Packaging Tax is likely to impact sectors such as cosmetics where the safety of the consumer is more integral to a product's design. Ultimately, it is likely to impact more vulnerable citizens hardest as the costs of adherence to the tax may need to be passed down the packaging value chain.

It should be noted that behavioural change is not always entirely achievable when there are some products for which packaging composition is subject to statutory requirements. Using recycled plastic can have a place here, although it is important that there is sufficient good quality feedstock to maintain the source of recyclable plastic while ensuring what is used is safe for cosmetic products.

Members of CTPA feel that a modulated, reformed Extended Producer Responsibility scheme is the best way to incentivise innovation and would be more successful in achieving the stated aims than the proposed tax.

CTPA has concerns that the timing for the tax and the EPR are not aligned; this tax will be introduced before investment in waste management has produced enough high-quality recycled material for re-introduction to the packaging supply chain.

Whilst members feel that a Deposit Return Scheme would increase the availability and quality of recyclate, they are questioning the availability of this material as well as the impact any DRS will have on the production of high-quality material from improved kerbside collection and processing. If insufficient recycled material is available to fulfil the conditions associated with reducing taxation on packaging, this will unfairly discriminate sectors where the quality of recyclate is paramount for reasons of safety and quality. As there is a lack of grades or standards associated with PCR, Food Grade recyclate is frequently used by the cosmetics industry currently and there is already fierce competition with other sectors for the same, limited quantity of material. It is vital to the cosmetics industry that we know the grade and origin of recycled material together with any possible impurities.

CTPA supports the Government's efforts to introduce a nationally consistent household waste recycling system that improves the quantity and quality of recyclate available to industry; moving as swiftly as possible to packaging labelling that has just two messages; recycling bin or waste bin. As an industry we recognise that our labelling and communications can help raise public awareness and we are working hard to improve this. All measures need to be considered to support behaviour around recycling.

2. How should alternatives to plastic consumption be identified and supported, without resorting to more environmentally damaging options?

CTPA is actively working with members on reducing over-packaging, sustainable packaging design, the potential to use alternative materials in consideration of the relative environmental impacts. It also supports appropriate use of schemes such as reuse models,

take-back schemes to maximise the meaningful collection of problematic cosmetic packaging and is exploring potential ways of reprocessing and reusing the valuable material collected.

3. Is the UK Government's target of eliminating avoidable plastic waste by 2042 ambitious enough?

CTPA supports the UK Plastics Pact and its targets for 2025 or before:

- Eliminate problematic or unnecessary single-use packaging through redesign, innovation or alternative (reuse) delivery model.
- 100% of plastics packaging to be reusable, recyclable or compostable.
- 70% of plastics packaging effectively recycled or composted.
- 30% average recycled content across all plastic packaging.

Therefore, the 2042 date appears unaspining.

4. Will the UK Government be able to achieve its shorter-term ambition of working towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025?

As highlighted above, the UK Plastics Pact, which has a significant number of members, has this as one of its targets and will hopefully drive the ambitions of those companies that are not members.

5. Does the UK Government need to do more to ensure that plastic waste is not exported and then managed unsustainably? If so, what steps should it take?

The aim, ultimately, should be to ensure resources and infrastructure are in place to handle all the waste domestically. Not only is this a moral imperative, it also enables maximum value to be added to the waste material and ensures circularity of resources.