Proposal for Growth of the UK Plastics Recycling Sector in a Circular Economy 2017
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BPF Recycling Group: Its Remit, Mission and Objectives

The British Plastics Federation

Objective:

The British Plastics Federation’s (BPF) principal objective, as stated in its Memorandum of Association, is:

*To promote co-operation in the United Kingdom between corporations carrying out business or employed in the plastics and allied industries.*

The BPF Recycling Group

Mission statement:

*To champion the wider use of UK-manufactured reprocessed polymer in all types of new plastic products, by leading on resource efficient, sustainable and high quality plastic recycling in the UK.*

*To promote the transition to a circular economy, while securing growth in employment, infrastructure and economic value for the recycling industry and UK PLC, to deliver the best environmental outcome.*

Objectives:

1. To promote the environmentally responsible management of end-of-life plastics in accordance with the European waste hierarchy.
2. To promote the use of high-quality recycled polymer in new plastic products within the UK as part of the transition towards a circular economy.
3. To encourage the development of mechanical recycling capacity processing technology in the UK.
4. To promote co-operation throughout the recycling value chain in order to deliver added value, such as wealth and job creation.
5. To provide evidence of the scale and scope of the plastic recycling industry and promote it as a vital and growing part of the UK resource recovery market.
Scope

Members are required to pledge their support to the ethos of the mission statement and agree to conduct their business activities in accordance with the objectives of the BPF and its Recycling Group (BPFRG).

The BPFRG represents plastics reprocessors and other organisations at the forefront of UK plastics recycling. Its membership enables the group to act as a focal point for information, experience and valued opinion to industry, the government and the public.

The BPFRG represents organisations involved in the collection, sorting and reprocessing of plastic waste, together with companies that convert waste plastics back into new polymer materials and products. These activities include the recycling of:

- Plastic bottles and other packaging from UK household collections.
- Flexible film recycling both post-consumer and post-industrial sources.
- Rigid plastics from waste electrical equipment and end-of-life vehicles.
- Plastics from construction.
- Agricultural and Horticultural plastics.
- Industrial and production waste.

The group works closely with other recycling organisations in the UK and abroad and is itself a member of Plastics Recyclers Europe (PRE), a European plastics recycling organisation.
Introduction

In December 2015, 195 countries including the UK adopted a legally binding global climate deal. This agreement was to keep the increase in global average temperature well below 2°C and to aim to limit the increase to 1.5°C. To achieve this target, it is essential that the UK moves towards low carbon manufacturing and accelerates the transition towards a circular economy. The plastics industry and in particular the recycling sector has a key role to play in this.

Plastic is a sustainable material contributing to the reduction of energy and water consumption and helping prevent food waste. At end of life the majority of plastic is fully recyclable and can be converted back into a wide range of new products. The BPFRG recognises the importance of recycling to the sustainability of the whole plastics industry and wants to ensure the market continues to develop and recycling rates increase. The stretching targets of 65% recycling of municipal waste and 75% of packaging waste by 2030 under the proposed EU Circular Economy Package provides another driver for this.

This manifesto sets out the proposals that the BPFRG has identified that would help the sector to grow and to contribute towards a circular economy in the UK. These proposals help to address current issues that prevent certain materials from being recycled or businesses from being able to grow and include:

- Collaboration with the Plastics Industry Recycling Action Plan (PIRAP).
- Split plastic packaging recycling target.
- Creation of an investment fund for developing new technologies.
- Creation of a standard for all grades of plastic feedstock for the UK or export market.
- Introduction of recycled procurement for all public bodies and large corporate companies that incorporates the use of products with high recycled content.

Further to the proposals that are being explored in this document, the group supports ensuring end-of-life plastics are managed at the optimum level within the waste hierarchy and having consistent collections for technically and economically recyclable plastics. Moreover, the group also supports a stronger uptake of the existing ‘design for recycling’ guidelines and with reward-based drivers available to organisations that apply the guidelines to their own product lines.

The group also continues to represent the industry’s view on the following issues:

- Legacy additives — small limits imposed on certain chemicals, under
chemical legislation such as REACH\(^1\) and POPs\(^2\), have the potential to prevent longer-life products containing these from being recycled into new products (e.g. WEEE, ELV & construction waste)

- Biodegradable material — even a perceived risk there may be biodegradable plastic material within recycled plastics can prevent them from being used for long-term products, particularly in the construction industry, where long guarantees are required.

Collaboration with PIRAP

The Plastics Industry Recycling Action Plan (PIRAP) is an industry action plan to help to increase the amount of plastic packaging recycled. The plan is a whole value chain approach with each area being asked to do its bit towards collectively helping to increase plastic packaging recycling. The BPFRG will take a greater responsibility for PIRAP and will work with other stakeholders to help develop actions through it. The BPFRG will engage in specific projects to help solve the ‘difficult’ or ‘not widely’ recycled plastics. Furthermore, it will use this manifesto to help drive demand and end markets for recycled plastics.

Proposal A: Split Plastic Packaging Recycling Target

In its 2014 manifesto the BPFRG proposed that recycling targets should be split between plastic packaging waste that remains in the UK and Europe and that which went elsewhere. The group still supports this from both an environmental and business perspective. However, it believes, in the new political climate, that the split should be between waste staying and leaving the UK. The split target would provide a clear route to achieving increased UK recycling targets by creating a corresponding recycling infrastructure and end market growth. This approach minimises market disruption by ensuring clear targets focused on delivering incentives to the UK recycling sector and reducing reliance on volatile global markets for waste.

Figure 1 shows that UK plastic recycling has flatted and the growth in plastic recycling rates has been a result of an increase in export.

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\(^1\) REACH is the Registration, Evaluation, Authorisation and restriction of Chemicals and is a European Union regulation. REACH aims to:
- Protect human health and the environment.
- Make people who put chemicals on the market understand and manage the risk from them.
- Allow free movement of substances on the EU market.
- Enhance innovation in and the competitiveness of the EU chemicals industry.
- Promote the use of alternative methods for the assessment of the hazardous properties of substances.

[Source: Health and Safety Executive website]

\(^2\) POPs stands for Persistent Organic Pollutants. These are chemical substances that persist in the environment, bioaccumulate through the food web, and post a risk of causing adverse effects to human health and the environment.

[Source: European Commission website]
The Packaging Recovery Note (PRN) and Packaging Export Recovery Note (PERN) should be viewed as two different pieces of evidence, the first being fully reprocessed material and the second a bale of unprocessed material. The split would mean a higher percentage of the obligated companies’ evidence would have to come from PRNs rather than PERNs. This proposal is not to create an advantage for UK recyclers but to ensure a level playing field. Currently, reprocessed material from UK facilities that is ready to be made back into new products is viewed the same as plastic being exported that has undergone no reprocessing.

Advantages would be:

- Retaining resources within the UK.
- Better environmental outcome as material is recycled closer to source.
- Creation of UK-based jobs.
- Drive investment through the PRN scheme towards the development of household plastic recycling.

![Figure 1 - Plastic packaging recycling tonnage for each quarter from 2011 – 2016](Source: 360 Environmental)

The BPFRG feels this proposal would help to improve the current PRN system if it remained. However, the group feels more radical change is needed. It would like alternative Extended Producer Responsibility (EPR) schemes to be investigated. It also believes that the ‘offset proposal’ outlined in its 2014 manifesto remains an essential tool to encourage brand owners to specify recycled products in packaging products.
Proposal B: Creation of an Investment Fund for Developing New Technologies

Innovation and the development of new technology is key to overcoming barriers that prevent the viable recycling of certain materials. It is also needed to establish new markets for recycled material that allow the industry to grow. Innovation is already taking place but the financing is not always in place to take these projects forward. This fund would provide this and therefore allow these new technologies to become commercially viable. This would help towards increasing recycling rates for plastics. The BPFRG see this fund particularly benefiting the development of pots, tubs and trays recycling. Currently 74%\(^3\) of councils offer this service but not all types of pots, tubs and trays are readily recyclable. As pots, tubs and trays are included as core material in the consistency framework, it is essential solutions are found. Pots, tubs and trays recycling would also make a significant contribution to the UK’s 57% plastic packaging recycling target by 2020, as currently only 30%\(^4\) of them are recycled.

This fund would be financed either by:

- Producers as part of their extended producer responsibility (EPR).
- Introducing a minimum PRN/PERN price which is ring-fenced for this use.
- Landfill tax.

This would ensure that money from producer responsibility goes towards developing the plastic recycling industry. Obligated companies would also be able to demonstrate to their customers that they are helping to overcome the barriers that prevent some materials from currently being recycled.

Advantages would be:

- Development of a plastic recycling industry infrastructure, capability and skills base.
- The opportunity to overcome the challenges of currently difficult to recycle material streams.
- Encouragement of innovation.

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\(^3\) Recoup, 2016 UK Household Plastics Collection Survey
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Proposal C: Develop Standards for all Grades of Plastic Feedstock for the UK or Export

Quality is key to the plastic recycling industry and currently low quality feedstock is leading to plastic reprocessors having to undertake extensive sorting before the material can be recycled. This sorting is despite the material having already been sorted through a MRF and/or PRF and having specified a particular material grade.

The BPFRG would like standards for all plastic grades and would encourage both UK reprocessors and exporters to only accept material meeting this standard. This would provide an advantage to businesses who are working to reduce contamination and also encourage change in those not meeting the standard. It is anticipated this would be fed down to household level and further work done to reduce contamination at source.

The BPFRG are aware of existing work that has been done on this such as the Recycling Quality Information Point (ReQIP) from the Resource Association. The group will explore existing work and how to utilise this as part of the standards.

Advantages would be:

- Higher quality material reducing wastage costs and increasing process efficiencies and yield
- Recognition for companies who are working to reduce contamination
- Standardisation of material for reprocessors and exporters — enabling higher trading confidence levels around quality:price relationships

Proposal D: Introduction of Recycled Content Procurement for all Public Bodies and Large Corporate Companies

The BPFRG believes that the creation of recycled content procurement policies within public bodies and large corporate companies would provide the stable end markets that are needed for the plastic recycling industry. It would help provide confidence in the sector, which would enable investment to take place and in turn the sector to grow. There would also be an opportunity to widen the range of products with recycled content. These products could then also be available to the public allowing them to see the circular flow of plastics and value of the material, which would help motivate them to recycle.

Advantages would be:

- Creation of an end market for recycled plastic products.
- Development of new recycled products.
- Promoting UK-based manufacturing of products using locally sourced raw materials.
Reduced dependency on oil-based polymer feedstocks with high embedded carbon-cost.

To ensure the success of this proposal it would need to be ensured that the use of recycled content was not undermined by regulation on legacy additives or the perceived risk of biodegradable material. As discussed in the introduction, these are both areas that have the potential to severely limit end markets.

Supporting

In addition to the proposals set out, the BPFRG also supports the following:

Ensuring end-of-life plastics are managed at the optimum level within the waste hierarchy

The group wants to ensure plastic is treated to the highest possible level of the waste hierarchy and encourages innovation to help increase recycling levels. However, it wants to ensure that this is done without it having a detrimental effect on the quality of other material or its ability to be recycled. The group recognises the environmental benefits to reducing reliance on landfill and increasing recycling. The ‘Environmental Benefits of recycling – 2010 update’ report from WRAP, which undertook lifecycle assessments for recycling, landfill, incineration with energy recovery and pyrolysis for plastics, found that mechanical recycling is the best alternative with regard to climate change potential, depletion of natural resources and energy demand. The savings were mainly from avoided material production. Landfill in this study had the greatest environmental burden in the majority of cases.

The consistent collection of technically and economically recyclable plastics

It is widely recognised that inconsistent collections create confusion among the public. This confusion can lead the householders either leaving out items that could be recycled or including non-target material. A recent report from Viridor found that “69% would be encouraged to recycle if the recycling system was easier and simpler to use”\(^5\). The BPFRG therefore supports the consistent collection of plastic that can be technically and economically recycled. Consistent collections will also help to drive up quality, which is a major concern for the whole recycling industry.

Design for recycling guide

Products placed on the market must be designed taking into consideration what happens to them at end of life and ensuring they are dealt with as high up the waste hierarchy as possible. This means that wherever possible products should be recyclable.

\(^5\) Viridor, 2016 Viridor UK Recycling Index 2016
rather than having to go for energy recovery. This enables the valuable resource to be conserved and used for new products. The BPFRG will promote the following guidelines as best practice for designers:

- Recoup’s *Recyclability by Design* – 6th edition of this essential guide for the design and development of plastic packaging by polymer type in the UK. It includes information from experts in packaging and recycling industries
- Recyclass™ - this is an online tool which gives a scale from A – F on how recyclable an item of packaging is. Packaging can receive a certification for its recyclability and a label can be licensed

The BPFRG encourages a high level of technical agreement between all guidelines to ensure designers are given consistent messages.

The BPFRG view the ‘The On-pack Recycling Label (OPRL)’ as another useful tool to engage with designers producing new packaging as well as communicating to the public what is recyclable.