27th June 2017

Dear Sir / Madam,

The British Plastics Federation (BPF), as the UK’s leading plastics trade association, supports the latest Ellen MacArthur Foundation’s report “The New Plastics Economy: Catalysing Action”; a dialogue-based and innovation-driven initiative which can lead to a more sustainable future for plastic packaging and help scale up the Circular Economy.

The report acknowledges that plastic packaging serves an important role in preserving and protecting goods, preventing food waste and guaranteeing safe transport. Additionally, the catalysing actions appear to be in line with the overall ambitions of the plastics supply chain to enhance the circularity of its products whilst ensuring optimum resource efficiency and respecting the waste hierarchy.

However, there are some areas where the BPF believes further consideration is required.

- The report refers to Expanded Polystyrene (EPS), Polystyrene (PS) and Polyvinyl Chloride (PVC) as ‘uncommon plastic packaging’ materials and recommends replacing these materials with alternatives as the ONLY solution.

Packaging is chosen based on its ability to carry out its function of protecting and preserving products. Each specific type of plastic has its own unique properties and has been specifically selected for its ability to perform a required function. With 6%\(^1\) of the UK’s water requirements and 3%\(^2\) of the UK’s domestic

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Director-General

The Voice of the UK Plastics Industry
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greenhouse gas emissions being used to produce food which is wasted it is essential to use packaging to maximise foods’ shelf life.

PVC is used for its superior oxygen and water vapour barriers which make it viable to use for pharmaceuticals etc. It also prevents the growth of microorganisms in sensitive applications.

EPS is the primary and most hygienic way to transport fish and fresh chilled vegetables. It minimises food waste in comparison to other materials.

PS is widely used to help protect products and, as with EPS, this will prevent spoilage and therefore reduce food waste. It is also a cost-effective packaging which is easy to process.

The BPF believes that it is essential that brand owners make informed and objective decisions concerning the sustainability of the packaging specified for their products and that Life Cycle Analysis (LCA) should form the basis of this decision making.

- Scaling up of the use of compostable material

The BPF was pleased there was recognition that adequate infrastructure would be required to scale up the use of compostable material. However, it would like reassurances as to how to ensure that the compostable material ends up in the organic recycling stream rather than the plastic recycling stream. Even within ‘closed systems’ there can be a danger of material escaping. Degradable material of any type in plastic recycling stream can have a detrimental effect on the recycling process and on the quality of recycled material which could impact negatively on end markets particularly for long-term applications.

- Elimination of polythene shrink and stretch films

The report suggests the elimination in the use of polythene shrink and stretch films which are widely used as transit packaging, especially for the majority of food delivered to supermarkets. Shrink and stretch films are already widely collected for recycling with at least 90% of supermarket material collected. These materials form the core raw material on which the plastics recycling sector depend and without them there would be a contraction in recycling capacity which would be detrimental to many key objectives proposed.

We do that hope that you will give these points your serious consideration. We are very happy to discuss them further with you.

Yours Sincerely

Philip K Law M.A., FIMMM
Director-General