

consumer information obligation



2011

In 1999 the Producer Responsibility (Packaging Waste) Regulations were amended, (number 3447), to include the Consumer Information Obligation. There is no requirement for any 'seller' to take back packaging or recycle on behalf of their customers. However companies who are sellers are required to provide information to the users of packaging about methods of re-use, recovery and recycling of packaging and packaging waste.

The accepted hierarchy of environmental best practice with regards to packaging is:

- 1) Reduce
- 2) Re-use
- 3) Recycle
- 4) Recover and
- 5) Landfill.

The practical meaning of these different options is outlined below.

Reduction

Reduction is achieved by reducing the amount of packaging used and so minimising the quantity of raw materials, including energy, consumed. Typical examples include reducing the number of layers, reducing the size of a container, its thickness and the amount of padding used.

Packaging reduction must be balanced against marketing pressures and the need to protect the product from damage.

Re-use

Where packaging can be re-used there is generally a saving in both costs and resources. This might involve replacing one way packaging with more robust multi trip versions.

The increased initial costs and resources should be offset by the savings over the life of the container. This approach is most viable where regular, repeat deliveries are made to the same customer and containers can be returned via back loading.

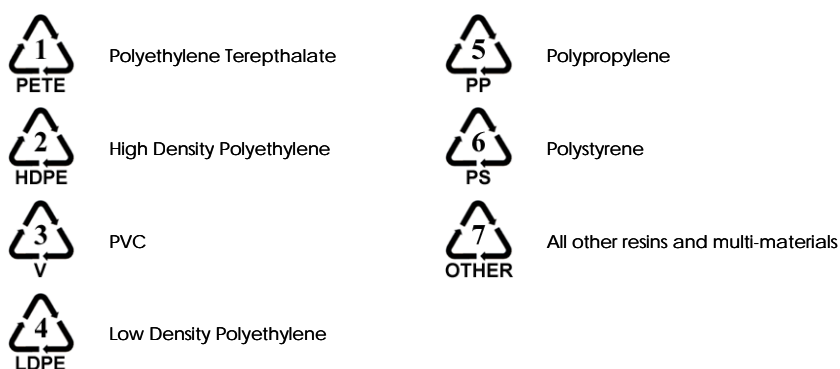
Where back loading is not possible the user will need to consider the viability and costs of return transport. This method is widely used for example for car components as part of a Just In Time delivery system.

Recycling

Recycling involves the mechanical processing of pre-used packaging to produce a fresh product or packaging, this could include composting. The advantages of this are that fewer raw materials are consumed and less back door waste ends up in landfill. The keys to viable recycling are segregation and an efficient collection system. Material must be free from contamination and plastics separated into the different polymer groups.

Light, bulky materials such as cardboard, plastics and empty cans or drums should be compacted, baled or shredded to maximise collection payloads thereby reducing fuel usage and transport costs.

Where packaging design can be influenced it is possible to specify packaging made from recycled rather than virgin material. In addition it is important to ensure that plastics are made from a single polymer wherever possible, and are always marked with the relevant identity symbol to aid identification.



Laminates and composites are difficult to segregate and may therefore be uneconomical to recycle. Where possible use single material types or easily separated packaging.

Whilst many plastic reprocessors are small scale operations who collect scrap packaging waste direct from the producers, larger steel, paper, chipboard and aluminium mills rely upon a network of local merchants to collect from individual producers then sort and deliver bulk loads to the mills.

To identify local merchants or recyclers you can contact the Recycling Officer at your local council or try the following trade organisations as a starting point.

Name of Organisation

Tel No

Aluminium Packaging Recycling Organisation (Alupro)	01527 597 757
Association for Organics Recycling	08701 603 270
British Glass Recycling Co Ltd	01142 901 850
British Metals Federation	01480 455 249
British Plastics Federation	02074 575 000
British Recovered Paper Association	01793 889 600
British Steel Packaging Recycling Unit	01495 334 521
Independent Waste Paper Processors Association	01327 703 223
Oil Recycling Association (ORA)	01279 814 035
Recoup (plastic bottle recycling)	01733 390 021
Steel Can Recycling Information Bureau	01554 712 632
Textile Recycling Association	08456 008 276
Timber Packaging and Pallet Confederation	01162 640 579
Energy from Waste Association	01714 027 110

Recovery

Recovery in this context means recovering energy from the waste packaging by combustion and using this to generate electricity, hot water or useful heat. Waste to Energy plants are particularly relevant in large cities where there are no nearby landfill sites and there is a local market for the energy produced. Small waste to energy units can be viable at factory level, these most commonly burn cardboard/paper, timber/sawdust, solvents or oils rather than mixed general waste because they must meet strict emissions standards and are cheaper to manufacture when a single fuel stream is used.

The energy might provide all the energy requirements of a business, or be used to supplement more traditional power sources. This type of system is most appropriate for those with large quantities of clean combustible packaging waste and a need for thermal energy, it is an increasingly attractive option following the recent introduction of the Climate Change Levy.

Landfill

Landfill is the final resort option. Waste should be transported by a registered waste carrier to an appropriately licensed site, possibly via a registered waste transfer station. The carrier should supply a Waste Transfer Note for each consignment or an annual WTN where repeat transfers of similar waste are made from the same source to the same destination. Copies of relevant licenses and details of the full audit trail should also be provided on request.

Under the Duty of Care legislation producers of waste share the responsibility for the safe and legal disposal of waste even after it has left their premises. (Further details are available from your local Environment Agency office)

Summary

The information provided above aims to help Kite Packaging Customers and Kite Environmental Solutions Members understand their obligations under the Regulations.

Additional information is available on 'The Industry Council for Packaging and the Environment' website at www.incpen.org.