

Feedback from: feedback from the REA

1. Please share your feedback on the vision overview (Annex 1)

Organically Recyclable Packaging (ORP) is packaging that has a valid certificate of compliance with at least one of the organics recycling industry/regulator specified standards, that certificate having been issued by an independent certification body.

To date, ORP products placed on the UK market tend to be those independently certified industrially compostable, home compostable or with both certifications.

REA's feedback during the visioning process has included that although ORP is niche in tonnage terms compared with all packaging placed on the UK market, ORP should be used in targeted product formats and contexts of use that support efficient organic recycling of food wastes and good quality digestates and composts.

Annex 1: 'Increase in rates of re-use and recycling that align with the outcomes': **yes** we agree, on the basis that 'recycling' can also be organic recycling (composting, AD or integrated AD and composting) and that ORP is used in targeted product formats and contexts of use that support efficient organic recycling of food wastes and good quality digestates and composts.

Annex 1: 'Increased longevity of materials in use'. ORP: considering home and industrially compostable lightweight carrier bags, they can be initially used and then re-used as carrier bags (on-bag print encouraging users to do this is welcome, as has been done by the Co-Op). Their last, re-purposed use as kitchen caddy liner or food waste bin liner is appropriate and, in terms of kerbside collected food wastes, reduces risks that non-compostable plastics find their way through to soils. Such bags can alternatively be home composted in well-managed home composting heaps/units/bins. Encouraging these bags' re-use as carrier bags and their last re-purposed use as kitchen caddy/food bin liners appears in line with the 'increased longevity of materials in use' goal.

Tea bags are an example of an ORP product format where 'increased longevity of materials in use' might not bring more overall benefit. Does the vision mean increased product shelf life, re-use of the product (encouraging re-brewing using the same-tea-in-same-bag?) or something else?

Column of bullet points under 'Creating the right infrastructure': we interpret ORP as being covered by what's in those bullet points. 'Increased investment in re-use infrastructure': yes we support this but also fed back during the visioning process that targeted-ORP's more geographically widespread organic recycling would be aided by;

- increasing the percentage of existing composting facilities that organically recycle ORP,

- where feasible, adapting existing food waste-fed AD to recycle ORP, and
- identifying and, where needed, putting in place drivers for NEW organic recycling facility models that aid net zero and bioresource circularity goals, including capability to biodegrade ORP.

With that in mind, the shared vision should include 'Investment in adaptation of existing organic recycling infrastructure where feasible and for new build organic recycling infrastructure, designing in capability to on-site biodegrade ORP'.

2. Do you accept this vision as a basis to support further work including transition planning? Please include your rationale.

Yes, provided it includes targeted use of ORP (as above and as communicated by REA during the visioning process with stakeholders).

3. Please share your feedback on the transition plan overview (Annex 2)

Annex 2's transition plan seems okay. Our experience of EPR and wider packaging discussions to date is that conventionally and chemically recyclable packaging takes up most of peoples' bandwidth. ORP needs to be resource-factored into this transition planning.

4. Is there anything you wish to be considered as part of the transition plan?

Yes. Some of the ORP issues are similar to conventional materials issues, e.g. in which targeted product formats and contexts of use does it make sense to deploy them, and when?

Other ORP issues are not similar to those for conventional materials, e.g. organic recycling of ORP is not held back by a need to develop UK markets for composts. Although digestate access to additional UK market sectors beyond agriculture, field-scale horticulture, forestry, land restoration and land remediation would be welcome, significant quantities of composts and digestates are used annually within these market sectors, mainly in agriculture.

A further example is that of bioresource circularity: standards exist for determining an ORP product's bio-based content - it's percentage made of/derived from non-fossilised plants, algae or mycelium – as do services for independent assessment and certification of an ORP product's bio-based content. If such circularity is unclear to policy makers, we would like to address this. The Ellen MacArthur Foundation recognises the bio-loops as part of circular economy, albeit separate from the loops for conventionally recyclable materials.

REA would like to be part of the transition plans/discussions.

Please send your completed responses to cprstakeholder-readiness@defra.gov.uk by 28 April 2023