

Nikita Hall

20th august 2018

Scrutiny officer

States of Jersey

Dear Nikita

Thank you for allowing me to put my view across regarding the single use of plastics which is a hot topic at present, Pack & Wrap Jersey & A1 Guernsey are both divisions of JJ Fox Trading and we are the largest importer of disposable packaging within the Channel Islands and have been trading since 1987, we take our responsibility very seriously and its good Jersey is reviewing the use of plastics on the islands. It is important we ensure the most appropriate materials are used for the tasks required and the materials are dealt with correctly at their end of life to enable the States to play its role in the circular economy which requires all materials to be kept in use for as long as possible so reducing the use of virgin material,

Regarding your terms of reference point 1

It has been and always will be market forces which drives single use plastic from a health point also from a packing point when it comes to any product, Plastics are used for packaging because they combine the key benefits of enabling food and drink to be protected, shelf life to be extended, food waste to be reduced, food and drink to be transported safely in bulk and with a lower carbon footprint in transportation and production. Most plastics can also be recycled either via conventional plastic recycling facilities or by the increase use of depolymerisation which return plastic back to food grade polymers. Examples of removing plastics has resulted in increased food waste and damaged contents. Moving away from the use of plastics needs very careful consideration as the environmental consequences can be very damaging. The point of a single use paper cup is there is no risk of any infections, the point of using trays-punnets for strawberries is less damage to the fruit so you don't end up with a large scale food waste. The idea of not using a plastic syringe and being replaced by glass is not worth thinking about in the health industry.

The key to reducing plastic waste is to ensure it is collected and sent to a plastics recycling facility. This requires public involvement in disposing of used plastic packaging correctly, ensuring it is fairly clean and not littering. This increases the amount which is successfully recycled meeting circular economy requirements which is the most positive benefit to the whole society in the Islands

We believe plastic packaging is imported into Jersey to enable the Islands foodservice sector to operate, to enable agricultural producers to package their produce and export safely and indirectly as the result of importing food and drink. In considering policy for plastic packaging all 3 need to be considered. In the case of food on the go it is most important that the policy is not introduced that would negatively impact on the sector without considering the packaging for say ready meals which would then be given an unfair advantage

Point 2

We are receiving more inquiries regarding alternatives to plastic so the demand is for sure there but the main issue is cost. Plastic packaging just like all packaging should never be littered and business should work together to support campaigns to reduce littering and reducing the costs to Jersey of

dealing with it and this includes all the islands. Switching from one material to another does not reduce littering. It is not acceptable to select a material because it is felt to be better in a marine environment as the emphasis must be on preventing it getting there in the first place, nor can a material be considered to be better in a marine environment. Not all alternatives break down in a marine environment and the BBIA (trade body for biodegradables) states clearly that compostable will not help to reduce marine pollution and cannot contribute to solving the problem. Materials said to break down in the ocean result in small pieces of plastic which are easier for marine life to digest.

Point 3

As a Company it has always been our focus to offer eco-friendly alternatives from CFC free polystyrene to offering PLA products which we have stocked for more than 20 years, we stock a vast range of eco products and are always looking at extending this range, at present we hold the following products manufactured in the following materials (see attachment) all of which are classed as eco-friendly, Bagasse/Origo/PlA/Cpla/Oxo-Bio pp/Palm Leaf/Wood and on top of that 23% of our plastic is RPET and 45% of our sales are eco-friendly products and this range is growing, and the main issue with this packaging is there is a cost involved on average eco-friendly packaging is about 50% more expensive than plastic and this is an issue. I have over the last few months made the decision to discontinue the use of plastic straws and plastic stirrers which will be replaced with paper straws and wooden stirrers but due to the increase in the demand for these products I am having great difficulty in securing a stable supply route which is delaying the discontinuation of the plastics, we are also looking at all the plastic we purchase over the next few years to see where we can offer an alternative, our next aim would be to look at single use cutlery .The use of eco-friendly packaging has to be considered carefully. For instance if no composting facilities exist then such packaging serves no benefit versus non compostable packaging which can be recycled. Specialist facilities are required to enable compostable packaging to be composted and we do not have these in the Islands, it should also be understood that compostable plastics are still plastics but derived from non-petro chemical sources some of which have resulted in concerns from non-governments organisations such as Greenpeace.

While compostable packaging is in demand the public's understanding of what to do with it has not developed. The term biodegradable packaging is misleading with the suggestion it can be discarded and will somehow disappear – decompose quickly – it won't. There is a strong feeling the term biodegradable should no longer be used in the context of packaging.

The UK Government in assessing options are consulting business to understand the impacts to businesses of the various policies under consideration, let's see the channel Islands do the same.

Summery

The biggest issue we face in business regarding plastic and trying to reduce is the following

- 1) Customers ask for eco-friendly packaging but do not want the extra expense
- 2) Customers then ask why bother as we incinerate
- 3) We have no commercial compositing facility
- 4) Of the plastic bottles / cardboard / glass how much is recycled?

I have had a meeting with the working group that's helping the States roll out "plastic free jersey" which was attended by Andrew Truscott also Linzi Hawkins and unfortunately Jane Burns could not attend. I put our case forward and also offered which I think should be taken up is that Martin Kersh which is the Executive Director for the Foodservice Packaging Association and represents our industry to the UK Government and also Mike Revell the MD for the Socius buying group are willing to attend a meeting with the Scrutiny Panel and I propose that we should get all concerned around a table and debate what and how we can work together on this I would also recommend that Guernsey joins in as I have mentioned this before to Tina Ross-Norman from the States of Guernsey recycling .

Why can't the islands work as one instead of Guernsey shipping their waste to Sweden surely it makes more sense to ship to Jersey for incineration and if we work as one on recycling the volume might be sufficient to ship all plastic-board-paper-glass back to the UK

And has the agriculture industry been invited into this as they are by far the largest group importing plastics be it for packing potatoes or veg to covering the fields with plastic sheeting against frost and if all of the prepacked potatoes & veg etc. It is shipped back to the UK and that's an issue for the UK Government or ours















Also as a member of the FPA we are aware of the UK Governments thoughts / actions and as a member I will follow the best practice, We are also investigating where ever possible working with our suppliers on how we can help on closed loop also simply cups which is a plastic & paper collection and recycling service .

We strongly recommend that the States as I mentioned above considers packaging waste as a whole and not just plastics. All used packaging represents a resource and facilities need to be developed to collect more of it both at kerbside and on the go, to sort it and then ensure it reaches recyclers in the UK or even Europe, This will enable Jersey to play its full part in achieving the goals of the circular economy which we know the States is very keen to achieve.

Best regards

John Olver

Plastic resin id codes

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 PETE	 HDPE	 PVC	 LDPE	 PP	 PS	 OTHER
polyethylene terephthalate	high-density polyethylene	polyvinyl chloride	low-density polyethylene	polypropylene	polystyrene	other plastics, including acrylic, polycarbonate, polyactic fibers, nylon, fiberglass
soft drink bottles, mineral water, fruit juice containers and cooking oil	milk jugs, cleaning agents, laundry detergents, bleaching agents, shampoo bottles, washing and shower soaps	trays for sweets, fruit, plastic packing (bubble foil) and food foils to wrap the foodstuff	crushed bottles, shopping bags, highly-resistant sacks and most of the wrappings	furniture, consumers, luggage, toys as well as bumpers, lining and external borders of the cars	toys, hard packing, refrigerator trays, cosmetic bags, costume jewellery, audio cassettes, CD cases, vending cups	an example of one type is a polycarbonate used for CD production and baby feeding bottles
						
Other new/innovative materials						
Bagasse	moulded fibre	Bamboo, sugar cane, reeds				
Origo	bio plastic	corn + yam + PP plastic (70/30%)				
PLA	Polylactic Acid	made from sugar from corn (maize)				
CPLA	Crystallised Polylactic Acid	made from sugar from corn (maize)				
Oxo-bio PP	Oxo-Bio polypropylene Plastic	breaks down when exposed to sunlight or heat then is digested by microorganisms				
Palm Leaf	natural palm leaf					
Wood	bamboo, birch					