

19 December 2007

Dr Kevin Hawkins OBE
Director General
The British Retail Consortium
21 Dartmouth Street,
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Dear Kevin

BRC/WRAP On-Pack Recycling Labelling Consultation Paper: FDF Comments

Thank you for your letter of 20 November 2007 inviting comments on this joint initiative with Wrap.

You may be aware that FDF launched its Fivefold Environmental Ambition on 25 October 2007. One of these is to make a significant contribution to WRAP's work to achieve an absolute reduction in the level of packaging reaching households by 2010 compared to 2005 and provide more advice to consumers on how best to recycle or otherwise recover used packaging. Our response to this joint BRC/ WRAP initiative, which we very much welcome, is in the context of this publicly stated goal.

FDF supports the aspiration of having one consistent and easily understood labelling methodology which could be used both on retailer own label as well as brand own packaging. This is essential to maximise consumer uptake. With this in mind we would strongly advocate using the widely used and recognised Mobius Loop symbol on the proposed label to denote recyclability rather than the much less well known WRAP 'swoosh'. This would be consistent with the requirements of the International Standard, ISO 14021, concerning self-declared environmental claims which specifically advises that if a symbol is used for a recyclable claim then that symbol should be the Mobius loop to avoid symbol proliferation and consumer confusion. This is particularly important for those food manufacturers that supply international markets, not just the UK. This emphasis on the use of the Mobius loop to denote recyclability is also reflected in the UK Government's Green Claims Code.

Looking at the wording of the proposed label from a UK centric perspective we think that the proposed category 1 and 2 descriptions 'widely recycled' and 'check local recycling' would be meaningful and useful to domestic consumers. However, the basis for applying the description 'not currently recycled' for when < 20% local authorities collect could be counterproductive where there are in fact low levels of recycling going on. Applying this label in such circumstances could inadvertently confuse consumers and result in less material being collected by small start up schemes designed to increase investment in recycling infrastructure for the more difficult materials. FDF's preference therefore would be for this wording to be used only when, de facto, there is no local authority collection anywhere. If there are low levels albeit < 20%, then the use of 'check local recycling' would seem preferable.

Looking at the proposed category 1-3 descriptions from an international perspective, it is difficult to see how these would work as recycling infrastructure will vary considerably from country to country. This would therefore rule out the use of these descriptions for any branded goods which are produced in the UK where the same packaging is used for both UK and international markets, in order to avoid confusing and misleading consumers.

Regarding how the proposal would work in practice, FDF would like the 'Guidelines for Use' to stress the need for flexibility in the application of the new label. It would be unfortunate if this green initiative was to give rise to waste by requiring older, packaging to be thrown out as central advice on the split between widely recycled and check local recycling is updated. It would be better if it is expressly stated that updates should only taken on board only when older stocks of packaging have been used up to avoid unnecessary waste. In addition the 'Guidelines for Use' are silent about what should happen when use of the label is constrained by the overall size of the pack and/or its components. The Guidelines should therefore make clear that there will be circumstances which make use of the label impracticable – and maybe encourage the provision of information on company websites.

Finally, given the important role that FDF members have to play on this issue, we would very much welcome being more closely involved in the developmental work from here on. We would be particularly delighted if we could participate in the Retailer Working Group which is overseeing this project so we can keep our members close to it and increase buy in. I would be grateful if you could let me know if this is possible.

I am copying this letter to Liz Goodwin at WRAP and also to Edward Cooke in the BRC Secretariat whom I am aware is collating responses to the Consultation.

David Bellamy
Sustainability Manager

cc Liz Goodwin, WRAP
Edward Cooke, BRC