BIO-BASED AND BIODEGRADABLE INDUSTRIES ASSOCIATION

Registered Office: Pelmark House
11 Amwell Street
Ware
Herts
SG12 9HP
Telephone: 01920 443810
E-mail: admin@bbia.org.uk

Mr Ken Murphy
CEO TESCO PLC
Falcon Way, Shire Park,
Welwyn Garden City,
Hertfordshire, AL7 1TW

Date: 12 October 2020

Dear Mr Murphy,

On behalf of BBIA and its members I take this opportunity of welcoming you to your new role as CEO of Tesco. We wish you every success for the future, both personally and for the company and its employees.

Our members typically produce packaging materials which your suppliers use to protect and market the products that you sell to consumers. These materials are generally derived from readily renewable resources rather than fossil-oil sources and they are then independently tested and certified as compostable to the harmonised UK and EU norm BS EN13432:2000.

Our membership includes significant pioneers in this burgeoning sustainable packaging sector, employing significant numbers in the UK and thereby contributing strongly to 'UKPLC'; Manufacturing examples include Futamura UK in Cumbria, Biome in Hampshire and Sphere in Greater Manchester.

Compostable packaging is very popular with customers. Of 4000 interviewed recently by Populus, some 85% said they wanted to see more compostable packaging used and some 57% said they would actually pay more for the product if packaged with compostable materials.

Major brands such as Danone, PepsiCo, Nestle and Unilever have adopted compostable materials for a range of targeted uses. As part of its work on the influential UK Plastics Pact, WRAP, the UK national waste agency published guidelines in February 2020 which made clear that compostable materials have a role to play in a number of applications.

Significantly the landmark "Breaking the Plastic Wave" report published in July 2020 by the Pew Charitable Trust & Systemiq, clearly illustrates how compostable packaging is one of the 8 core solutions they identify as necessary to reduce plastic waste entering the environment.

You should know that 96% of plastic films used in the UK (but also across the planet) are not recycled and unlikely to be recycled at any time in the future. Further, just a total of 9% of all plastic packaging in the EU (and the UK) is effectively recycled. Those percentages are not rising, and this is due to the collapse of plastic prices causing the economics to be stacked against recycling. As the recent report from Which magazine

shows, brands which you sell using traditional packaging are clearly not recyclable nor are the labelling used helping consumers to understand what can and cannot be recycled.

Tesco has a clear policy to reduce plastic waste though simplification. This is indeed a part of the solution, but it must be complemented by other solutions for the goal to be achieved and critically it must take account of the nature of the application involved.

Certified compostable films or other packaging materials (like coffee capsules) are products independently proven to biodegrade in a natural process within a composting facility or within a home composting unit. They have the wonderful advantage of literally disappearing along with the food and garden waste they are composted with, thus reducing plastic waste and enhancing the quality of compost returned to soil. A simple graphic of the process is attached.

Regrettably however, Tesco's current 'Preferred packaging list' has essentially banned compostable packaging. We understand from supplier feedback and from contacts within Tesco's packaging team that this is due to a perception of a 'lack of recycling infrastructure for compostables'. Not true. The UK actually has a vast organic-recycling infrastructure treating 9 million tonnes pa of garden and food waste via conventional composting plus a vast anaerobic digestion infrastructure treating similar amounts. Over 50 composting units in the UK are already taking compostable packaging and over 200 are capable of doing so. This compares extremely favourably with the very real lack of practical recycling infrastructure for lightweight food-contaminated flexible plastics that are not going to be recycled now or in the near future.

Our industry is the first to agree that compostables should not be used where conventional recycling is established e.g. rigid applications such as beverage bottles. The use of compostables make best sense, as both WRAP and Pew/Systemiq point out, where food and food waste is concerned. With food waste they can be returned to composting and AD and sent safely to soil with the waste collected with them. Kerbside food waste collections are already in place in the three devolved nations and Ireland and will be mandatory too in England by 2023, so the route to collection will be ubiquitous across the whole of the UK and Ireland. In conjunction with this the BBIA is actively engaged with key stakeholders such as WRAP, OPRL & REA to ensure that such packaging will be effectively labelled and recognised throughout the consumer and waste-management chain.

Our appeal to you Mr Murphy is that the Tesco ban on the use of compostable packaging be reviewed. Tesco will show best leadership in plastic packaging reduction by proactively demonstrating their learning from environmental packaging experts such as Ellen Macarthur Foundation, Pew and Systemiq: lead the implementation of that holistic approach to the plastics crisis and help drive the move to non-fossil-derived, longer term eco-benign packaging solutions.

We would welcome the opportunity to meet with you in the near future to discuss this further.

Yours sincerely,

David Newman
Managing Director

Encs:
Infographics from Breaking the Plastic wave report 2020
BBIA Compostable packaging supply-chain infographic – from soil to plate and back to soil
Tesco RAG list 2020