



REFILL AND REUSE IN THE GROCERY SECTOR

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Sick of Plastic is facilitated by VOICE &
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Introduction and summary

This report is for Irish grocery sector wholesalers, retailers, consumers and policy makers, and is aimed at creating a clear understanding of the rationale behind the switch to refillable and reusable packaging in the grocery sector, and why it is necessary to set targets for refill and reuse.

Through their *Sick of Plastic* campaign VOICE and Friends of the Earth have been working with Ireland's top supermarket chains and we have a unique perspective on how the grocery sector in Ireland is managing, accounting for and reducing its dependence on single use packaging.

We know that plastic is choking our oceans and rivers, endangering our health, and warming our planet. We are producing more plastic packaging year on year. Up to this point a limited and patchwork policy of voluntary plastic reduction targets in the grocery sector has produced **minimal results**. Urgent action must be taken to **dramatically reduce the amount of single use plastic generated by our economy and to meet our 2025 and 2030 EU packaging waste reduction targets**. Ireland must reach the EU plastic packaging recycling rate target of **50% by 2025 and 55% by 2030**.¹ In order to achieve those targets we must look to reuse and refill solutions.

Reuse and refill solutions are increasingly recognised by governments, businesses and organisations around the world as a central pillar of any policy that seeks to address the global plastic crisis. Measures have already been adopted by governments across Europe and Ireland needs to implement them. **Now**.

This report contains thirteen key recommendations, including specific, measurable targets around reuse and refill, such as:

- *At least 25% of consumer packaging should be reusable by 2025, increasing to 50% by 2030.*
- *At least 75% of transit packaging should be reusable by 2025, increasing to 90% by 2030.*
- *20% of the floor surface of shops larger than 400 square metres should be fitted with refill systems by 2030.*
- *Beverage container refill target of 35% by 2025, increasing to 70% by 2030.*
- *Financial support for the installation of reuse infrastructure.*
- *Fiscal incentives to effect behaviour change and encourage the move to reuse.*

These recommendations will help to ensure that reuse and refill targets will be as robust as possible.

The state of play

The Government's Waste Action Plan for a Circular Economy notes that Ireland must transition to a more circular economy. We need 'to shift the focus away back up the product life cycle, to remove or design out harmful waste, to extend the life of the products and goods we use and prevent waste arising in the first place – consistent with the concept of a zero-waste future.'² (*emphasis added*). This imperative for change is global, and Ireland's high-level commitments are set out in the EU's Green Deal. In 2021 the heads of the Circular Economy Bill were put forward by the Government and in December 2021 the Oireachtas Joint Committee on Environment and Climate Action (the Committee) published its pre-legislative scrutiny report of the Circular Economy Bill. Having read submissions and listened to testimony from environmental NGOs, including VOICE, the Rediscovery Centre and Friends of the Earth, the Committee made a number of recommendations that can strengthen the Circular Economy Bill. We are calling on wholesalers, retailers, consumers and policy makers to support the Committee's report, together with the specific recommendations that we make here, in support of a sustainable grocery sector.

The latest Irish regional waste plans (2015 - 2021) called for a reduction of household generated waste of 1% per annum and a recycling rate for municipal waste of 50%. Unfortunately, neither target was met. According to the Irish Environmental

Protection Agency's (EPA's) waste statistics³ our household waste generation has remained largely unchanged over the past 10 years. Additionally, our recycling rate for municipal waste has hovered between a high of 41% and the most recent measurement of 38%.

We are not meeting our targets and will fail to meet EU targets if we continue on the current trajectory.

We are recycling more each year; increasing from 594,000 to 678,000 tonnes of household and commercial packaging waste from 2016 to 2019.⁴ This paints an optimistic picture, but it is only because we are **producing more waste**. If we investigate the proportion of packaging waste recycled, that is falling each year from 70% in 2016 to 67.5% in 2019 with **plastics at an abysmal 31%**.

In the grocery sector, which is a major contributor to Ireland's packaging waste problem, there has also been a decline in packaging recycling rates in recent years, from 74% in 2012 to 64% in 2018.

Data on single-use plastic production in the Irish grocery sector is limited. In the UK Greenpeace has calculated⁵ the total weight of single-use plastic packaging from supermarkets in 2019 was 653,000 tonnes. Although the relevant statistics are not publicly available for the Irish market, on a pro rata basis per head of population that would indicate **single use plastic packaging generated by Irish supermarkets in 2019 was around 48,000 tonnes**.

The EPA has stressed that meeting new 2025 and 2030 EU packaging recycling targets will be “challenging” for Ireland if we continue on our current trajectory, suggesting that preventing the initial creation of waste and incentivising reusable over single-use packaging are key actions that government and industry can take to correct our course.⁶



Source: European Union⁷

The Government must take ambitious action to prevent the creation of waste by insisting that packaging moves up the waste hierarchy. In relation to packaging, short of eliminating its use altogether, reuse is the only way to stop burning through our resources.

What are supermarkets doing about their plastic?

In recent years Ireland’s largest supermarket chains have set voluntary commitments to reduce plastic consumption and increase both the recycled content and recyclability of packaging materials. However, **key measures, such as sufficient investment in reusable solutions, the setting of ambitious targets and the publicising of**

progress, all remain absent from company policies.

It is impossible to comprehend the scale of the pollution caused by our grocery sector without the introduction of mandatory provisions requiring companies to report their plastic usage that is publicly available.

This table compares the current plastic reduction commitments made by Aldi, Lidl and Tesco, three of the largest supermarket chains operating in Ireland.

	ALDI	LIDL	TESCO
'PROBLEMATIC PACKAGING END'	2020	2025	No Date
SUSTAINABLE SOURCED PAPER AND CARDBOARD	2020	2025	2025
PLASTIC REDUCTION TARGET	50% by 2025	20% by 2022	No Date
OWN BRAND 100% RECYCLABLE	2021	2025	2025
LOOSE FRUIT AND VEG	X	20% of range	X
NO PLASTIC ON MULTIPACKS	X	X	✓
MICROBEADS BANNED?	✓	✓	X
REUSABLE MENSTRUAL ITEMS?	X	X	In selected stores
RECYCLING FACILITIES	Recycle bins at selected stores (no signage)	Recycling stations at each store (with signage)	Bottle banks at car parks, soft plastic at selected stores.
SINGLE USE CARRIER BAGS REMOVED TILLS	X	X	✓

(information correct August 2021)

While the actions taken to date by Aldi, Lidl and Tesco to reduce plastic consumption must be recognised and applauded, **a lack of consistency in both the ambition of plastic reduction targets and the date by which targets will be met is evident.**

The above table paints a picture that we cannot ignore: our current model of self-regulation and goal setting has seen piecemeal attempts to reduce plastic pollution and will likely continue in such a fashion until a genuine solution is found. Any future conversation must seek to write single-use solutions out of the policy lexicon.

The reuse solution

The purpose of this proposal is to place reuse and refill solutions to the plastic crisis at the centre of this conversation.

So what is meant by reuse, reusable packaging and refill systems?

Greenpeace's report, *Unpacked: How Supermarkets Can Cut Plastic Packaging in Half by 2025*,⁸ contains a number of useful definitions:

Reuse means any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

A **reuse system** is the creation of an arrangement (organizational, technical or financial) that ensures the possibility of reuse, whether in a closed loop (like an office or school) or open setting (like a supermarket).

Reusable packaging exists across primary (consumer facing packaging, secondary (products boxed up, often in cardboard boxes) and tertiary (shipping in bulk) packaging and is defined as packaging that is refilled or used for the same purpose for which it was conceived

in its original form, with no additional reprocessing needed, except for cleaning. Reusable packaging is designed to accomplish a minimum number of trips, or rotations, in a system designed for reuse.

Reusable consumer packaging

presents itself in **four** key formats:

Refill at home: Users refill a reusable container at home (e.g. refills delivered via a subscription service), the container is owned by customer.

Return from home: Reusable containers are collected from home by a pick-up service (e.g. a logistics company) and refilled; the container can be owned by the customer or rented from the company.

Refill on the go: Users refill their reusable container away from home (e.g. an in-store dispensing system); the container can be owned by customer or rented from the company.

Return on the go: Users return reusable containers at a store or drop-off point (e.g. in a deposit return machine or a drop box); the container can be owned by the customer or rented from the company.

Reusable transit packaging is secondary and tertiary packaging designed for reuse within a supply chain, constructed for multiple trips and extended life, in a closed-loop business to business system.

Naked/packaging free products (e.g. a loose shampoo bar) are not included in the framework.

How can reuse and refill help?

Reuse and refill systems complement and improve upon the ‘polluter pays’ framework by aiming for a significant reduction in waste, reuse and full cost recovery. It simply isn’t enough for supermarkets to contribute towards the collection and recycling of their packaging waste through the existing Extended Producer Responsibility scheme, REPAK. **We must set robust reuse targets too.**

Reuse represents an opportunity to accrue environmental benefits, economic savings, public and private support, and other supply chain benefits:

Environmental benefits

Pollution from plastics and single-use plastic packaging is choking our marine and land environments. The European Commission undertook a lifecycle assessment comparing greenhouse gas and air pollutant emissions from single-use plastics with reusable alternatives and, for food and drinks packaging items, found clear and significant benefits from the reusable alternatives across multiple metrics.⁹

Economic savings

There is no business resilient enough to survive the economic collapse that will accompany the destruction of our ecosystems. It’s not just about survival, however, reuse and refill solutions will help companies thrive in a circular economy. The Ellen MacArthur

Foundation estimates that converting 20% of current single-use plastic packaging to reusable presents an economically attractive proposition worth at least ten billion USD.¹⁰ For reusable ‘business to consumer’ primary packaging; ‘industrial processes would “put less in” to products in the first place... [and] better pack design and new businesses models would allow consumers to “get more out” of fewer resources. Overall material use and waste could be halved.’¹¹

Reuse and refill solutions also offer ‘improved user experience, customisable products, the ability to gather customer insight and build brand loyalty, as well as cost savings and optimised operations.’¹²

Reusable systems will aid Ireland’s green recovery¹³ as secondary businesses are created around a modern resource (rather than waste) management industry.

Public and private support

Even with the additional challenges presented by the Covid-19 pandemic, there is still clear demand from the public for solutions to the problem of single-use plastic packaging. A recent UK poll showed that 47% of customers said that they are willing to pay more for a product if the packaging has less of an environmental impact.¹⁴ Global market research platform Mintel recently concluded, ‘the companies that will “win” over the next 10 years will be those that fuel a new era of conscious consumption. Tomorrow’s consumers will actively seek out environmentally responsible packaging and aggressively reward brands that help them understand what is

actually better, rather than what is 'less bad.'¹⁵

Many companies are already making strides forward. Mars has committed to test at least ten reuse models. SC Johnson aims to increase its refill options, although these are mainly based on offering a concentrate to dilute with water at home (often requiring single-use plastic sachets). Danone, PepsiCo, Procter & Gamble and to a certain extent Henkel, all mention reuse in their strategies.

As part of our **#WeChooseReuse** campaign we organised a seminar with IBEC members and invited Catherine Conway from BeUnpackaged.co.uk to speak to us about reuse and refill solutions, and how they can work from a business perspective. 88 IBEC businesses were present on the day, with business leaders representing companies like Coca Cola, PepsiCo, Abbot, Danone, Glanbia, Kerry Foods and Mondelez. In a poll at the end of the seminar **77% of companies there said they are planning to bring in refill options in the future for their customers.**

Supply chain benefits

As well as costing less over time and offering security of supply, reusable transit containers tend to be better at protecting goods. The Ellen MacArthur Foundation points to supply chain benefits of reusable transit packaging such as fewer touch points, reduced damage and lower waste disposal requirement for retailers.¹⁶

International examples

France: A law introduced in 2020 aims to increase the proportion of reusable packaging on the market to 5% by 2023, 10% by 2027. The reusable containers must be recyclable at the end of life. By 2030, 20% of the floor surface of shops larger than 400 square metres must be fitted with refill systems. As of 1 January 2022 France has banned plastic on many fruit and vegetables in its supermarkets.

Romania: From 2020 businesses that put packaged goods on the market must demonstrate an annual average of 5% reusable packaging across all packaging formats, increasing by 5% per annum until reaching a minimum of 25% by 2025. Retailers will be required to give their customers the opportunity to choose reusable packaging and return it to the store. There are exemptions for small businesses.

Germany: Germany has adopted a target of 70% reusable beverage packaging. From this year businesses must offer a reusable alternative to consumers, which must not be more expensive than the single use option. This is having an immediate effect on demand for reusable systems.

Europe: The European Commission has committed to reviewing its Packaging and Packaging Waste Directive to reinforce mandatory "essential requirements", including driving design for reuse and potential restrictions on some packaging where there are reusable alternatives. This review will get underway in Summer 2022 and will also focus on ensuring that all packaging is less complex and easily recyclable.

Recommendations

1. Reuse targets

We recommend numerical reuse targets with clear implementation deadlines for the grocery sector. Targets send a strong signal to corporations that moving away from single use plastic to some other single use material is not acceptable. This mirrors the work the EU is doing on its revision of the Packaging and Packaging Waste Directive, which will have a bigger focus on reusable packaging. **We need binding targets for reusable/refillable packaging**, which other countries have adopted. Setting such targets for reuse will level the playing field for organisations operating in the grocery sector. Within an overall framework of single-use plastic packaging reduction, reuse/refill targets should:

- Be ambitious, to achieve a transformative effect on the grocery sector.
- Specifically focus on increasing reusable packaging.
- Be quantitative, with qualitative milestones (such as refill trials) as required.
- Set as a percentage of the total annual packaging put on the market in any given year, giving a dual incentive to reduce the overall amount of packaging.

It is important that timeframes be short enough to spur action with clear milestones for delivery, but also realistic enough to reflect the need for

infrastructure development that enables reuse. Targets must include all single-use packaging units sold, regardless of the material; otherwise the focus could be placed on substituting alternative single-use materials rather than on the necessary transition to reuse.

In the UK, usage rates of reusable transit packaging by individual retailers have been found to reach 76% for secondary packaging and as high as 91% for tertiary packaging.¹⁷ There already exists a number of proven, scaled, cost effective reusable solutions for secondary and tertiary packaging such as totes, dollies, roll-cages and pallets. **A higher target for reusable transit packaging should be set** to reflect these facts. Devising a separate target for transit packaging also seeks to avoid companies being able to meet their consumer reusable packaging target with transit packaging alone – developing reusable consumer packaging is key to eliminating unnecessary single-use plastic packaging and has a higher impact on consumer behaviour as it is public facing.

In its pre-legislative scrutiny report of the Circular Economy Bill, the Committee incorporates a recommendation made by Mindy O’Brien, Chief Executive of VOICE, that, following the example of France, **a binding floor surface target should be set to ensure the mainstreaming of refill and reuse infrastructure.**

Taking the above considerations into account, and with the aim of achieving a reduction of **at least 50% in single-use plastic packaging by 2025**, we recommend the following:

- At least 25% of consumer packaging should be reusable by 2025, increasing to 50% by 2030.
- At least 75% of transit packaging should be reusable by 2025, increasing to 90% by 2030.
- 20% of the floor surface of shops larger than 400 square meters should be fitted with refill systems by 2030.

2. Mandatory reporting

As one cannot manage what one does not measure, mandatory corporate reporting on plastic reduction and reuse / refill numbers should be introduced. Transparent reporting is critical in establishing a baseline for reporting comparable, relevant data year on year. This would also help to create a real level playing field for all sections of the grocery industry. This reporting must be an independently published, verifiable audit that is available for public perusal.

Supermarkets should be required to report the following key information which is available to the public:

- The number of units and tonnage of primary consumer single-use plastic packaging the company placed on the market, for:
 - i) Branded packaging.
 - ii) Own-brand packaging.
- The current average percentage (mean and median) of recycled content in the company's own-brand packaging.
- Whether the company has set a specific plastic packaging reduction target? If it has, the following details should be provided:

- i) The target and how it is being measured (by weight or in units).
- ii) The baseline year and measurement.
- iii) The year the target expected to be achieved.
- iv) The reduction percentage achieved to date.
- v) Whether the target applies to both own brand products and branded products.

- Whether the company set a target to increase the proportion of products sold through refillable or reusable packaging? If yes, the following details should be provided:

- i) The percentage of the company's total packaging that is reusable.
- ii) The target and how it is being measured (by weight or in units).
- iii) The baseline year and measurement.
- iv) The target and how it is being measured (by weight or in units).
- v) The year the target expected to be achieved.
- vi) The current status of progress towards the target.
- vii) The product ranges included.
- viii) Details of any refill and reuse initiatives and their scope.

3. Beverage refill targets

Germany has a beverage container refill target of 70% by 2030. According to a study by Environmental Action Germany, for beverage packaging in Germany, setting ambitious European reuse targets of at least 70 percent by 2030 offers great potential for waste prevention, since it accounts for 10% of overall packaging

waste. Many countries already have a small percentage of refillable beverage packaging on the market, with the necessary infrastructure in place. The mere need to expand these existing systems makes beverage packaging a truly low hanging fruit.¹⁸

We recommend that Ireland sets a specific beverage container refill target of 35% by 2025, increasing to 70% by 2030.

4. Financial support for reuse infrastructure

The Irish grocery sector does not currently have the infrastructure needed to support a robust, reuse-centred system on a national scale. Therefore, funding for infrastructure provision must be prioritised. The introduction of grants and financial aid for reuse/refill businesses would **encourage a move away from the overuse of packaging at the critical planning and design stage of a new business set up**. Ireland already provides supports to existing businesses through SEAI schemes and such schemes could be used to assist companies with investments in the development of standardized packaging, collection and storage solutions, sanitary systems, technology development, logistics and other machinery for reuse applications. The circular economy fund – which is envisaged in the Circular Economy Bill as being funded, inter alia, by receipts from levies - should provide the necessary finance directly to businesses for this investment. Additionally, as packaging has its own Extended Producer Responsibility Scheme (REPAK), a percentage of funds

received from producers should also fund this infrastructure development and outreach. In formulating funding packages for reuse infrastructure, authorities must consider the down stream cost savings of reducing the cost of waste disposal, as well as the impact in terms of carbon reduction.

5. Harmonisation

Ireland should support harmonised formats/designs for certain packaging types (e.g. cups, bottles and containers) to enable the scale-up of reuse and refill and reach grocery sector reuse targets.

6. Restrict the use of some single-use packaging formats

For certain applications (e.g. monodose, vegetable and fruit wrappers), single-use packing should be eliminated, in particular where reusable products or systems are widely available or consumer goods can be handled safely without packaging.

7. Incentivise

We recommend fiscal incentives that support reuse (e.g. levies, effective fee differentiation for reusable packaging, and 0% VAT on deposits for and rental of reusable containers).

8. Communicate

We need clear and locally tailored communications, explaining not only how, but also why, reuse and refill are important and beneficial to the protection of the natural environment and the creation of local jobs. Separately,

additional training by businesses around the handling of produce is required; according to University College Dublin research funded by the EPA, protection against physical damage' of produce that is the number one reason producers insist on so much packaging.¹⁹

9. Encourage new market actors

Support reuse start-ups, projects and consumers with knowledge and advice: provide guidance on how logistics for collection, cleaning and delivery of reusable containers is best carried out; facilitate effective ownership models and business development; and promote dissemination of best practices and knowledge exchange.

10. Regulate green claims

Prevent unverifiable claims of reusability and labelling as reusable in the absence of dedicated infrastructure to ensure the asset is reused over a minimum number of rotations, and address consumer confusion through explicit wording explaining how & by whom the item is intended to be reused.

11. Public procurement

Increase the demand for reusable products by adopting minimum mandatory green public procurement (GPP) policies that prioritise reuse products, for publicly-run and sponsored events and facilities.

12. Adopt a shared island approach

The potential for a shared island approach to prepare for reuse infrastructure in the grocery sector should be explored. This would offer economies of scale and a buffer to localised capacity shortages.

13. Joined up thinking

Truly robust reuse/refill infrastructure relies upon the support and input from all stakeholders. We advocate for more joined up thinking, which includes reuse/refill guidelines that are created with input from industry and supported by the FSAI, Food Drink Ireland and other statutory bodies responsible for ensuring food produced, distributed or marketed in Ireland complies with food safety and hygiene standards.

Conclusion

The supermarket is where the consumer is confronted most often by the problem of single-use plastic packaging. This proposal supports recommendations made by the Committee to create robust circular economy legislation that will draw emphasis away from end of pipe solutions and create support for and investment in infrastructure and businesses that will usher in the reuse and refill revolution. Here is an opportunity to make the circular economy a reality in the shopping carts of consumers around the country, and, for the sake of both people and the planet, it is an opportunity worth taking.

About Sick of Plastic

The *Sick of Plastic* campaign was formed in early 2018 when VOICE Ireland and Friends of the Earth noticed a surge in the public's frustration with single-use plastic. Despite introducing the plastic bag tax back in 2002, we're taking home more plastic in our 'reusable' bags than ever!

Sick of Plastic is working to empower communities to pressure industry and decision makers to take action on single-use plastic and unnecessary food packaging.

VOICE

VOICE has become one of the leading environmental charities in Ireland, celebrating its 25th anniversary this year. We offer policy proposals both on a national and EU level on waste and the circular economy initiatives as well as support bottom-up community and individual engagement. We move beyond merely running public awareness events and workshops by asking and helping individuals, communities and businesses to become active participants in achieving sustainable change in their local or business environments. We often work in collaboration with the government, local authorities, community groups, other NGOs and businesses to affect positive behaviour change.

FRIENDS OF THE EARTH

Friends of the Earth Ireland is a community at the heart of the growing movement here for a just world with zero pollution. We are part of the world's largest grassroots environmental network, which celebrates its 50th anniversary in 2021.

The world faces three interconnected crises: mass extinction, climate breakdown, and crippling inequality.

Earth is our only home and we will do everything in our power to protect it. We take a holistic approach to this, pushing for policy change – urging politicians to commit to action and holding them to account on this - while also supporting communities to create change from the bottom up. We run campaigns on a variety of topics, including Sick of Plastic which we run jointly with VOICE Ireland.

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