

Where to begin?

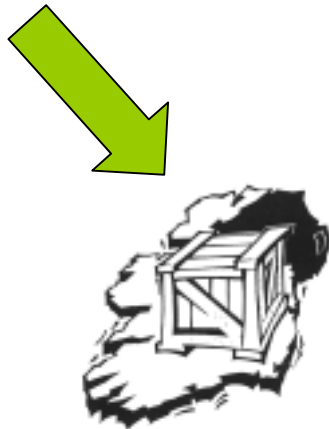
Creating a Data Capture System to Calculate Your Obligation

You're either in the process of joining Repak or you have a requirement to re-design your system in order to report the packaging you place on the market. Depending on the size and/or the complexity of your company's business model a system can be very detailed or conversely quite simple. You must ensure that it is suitable for audit by Repak's internal auditing staff or by independent auditing firms.

You need to look at your business and see what categories you fall under.

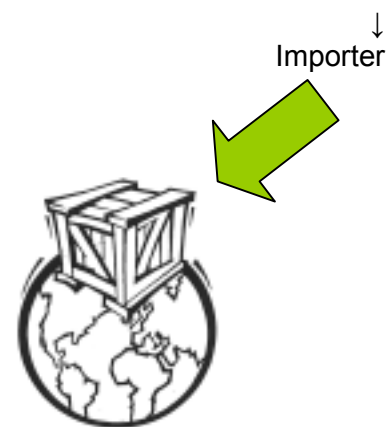
Below, is a generic supply chain, where your company may fall in to one or more categories:

Irish Manufacturer



Wholesaler
↓
Retailer
↓
End Consumer

Non Irish Manufacturer



Whether you purchase Irish sourced goods or rely on an importer, each product you handle will go through many stages within the supply chain.

You may either act under some or all of the following form headings:

- ✓ **Brandholder or Brandholder/Importer** (packaging you apply to products you own or packaging on product you import)
- ✓ **Distributor** (first to deliver your packaged good as you deliver yourself or collect from your customer) *or*
- ✓ **Retailer** (packaging removed by your customer, from your product) with regards to packaging you have applied yourself or packaging on products you import or source from other local suppliers *or*
- ✓ **Filled Packaging**(Packaging on products you export)

If you are involved in the packaging industry, you may also have an obligation to report your product under the following:

- ✓ **Materials Manufacturer** for the weight of packaging raw materials you either manufacture or import and place on the Irish market *or*

- ✓ **Converter** for the weight of packaging you either manufacture or import and place on the Irish market *or*
- ✓ **Empty Packaging** for the weight of packaging as product you export

Examine your role in the Supply Chain

When reporting to Repak, each company is responsible for the direct stages above and below as well as their own activity within the supply chain. Who are your suppliers? Who are your customers? If you purchase packaging, raw materials or finished goods, you do not need to know their country of origin, but rather the origin in the supply chain (Irish sourced – within the 26 counties, or imported). When you sell to your customers you must make a distinction between your customers in the Republic (Supplied in the Republic of Ireland) and those outside (All Exports).

You then need to relate these activities to the form.

What is Packaging?

Packaging is defined in the Waste Management Act, 1996 as:

“any material, container or wrapping, used for or in connection with the containment, transport, handling, protection, promotion, marketing or sale of any product or substance, including such packaging as may be prescribed;”

Promotional goods and display units are considered packaging. The brand owner has the obligation to report.

Article 6 of Commission Decision 97/138/EC states that process waste is not packaging. Therefore, process waste should NOT be reported:

“Only waste originating from packaging placed on the market may be considered ... excluding any kind of production residues from the production of packaging or of packaging materials or from any other production process.”

Repak is only interested in packaging. Therefore you should not report weights of production residues from the manufacturing of packaging, packaging materials or any other products.

Packaging which was purchased by you but unused, can be reported as waste in section 1.3, which is your Internal Packaging Waste Management. You must disclose whether this went for Recycling, Recovery or Disposal.

Where there is uncertainty on a product's status as packaging, read through the following statements to clarify it's function:

- Does it **contain** the primary product? → Yes, then it is packaging
- Does it **group** the products together? → Yes, then it is packaging
- Did you apply it for **transportation** purposes? → Yes, then it is packaging

- Does it assist in **handling** the product? → Yes, then it is packaging
- Is it necessary for **protection**? → Yes, then it is packaging
- Is the material used to **promote** the product? → Yes, then it is packaging
- Does the packaging **market** the product? → Yes, then it is packaging
- Is the material **prescribed** for the product? → Yes, then it is packaging
- Is it a **promotional** good? → Yes, then it is packaging
- Is it a **display** unit? → Yes, then it is packaging

Where the packaging has another use, which far out weighs its packaging function, then it can be excluded from reporting, or example, as sausage skin. However examples such as this are rare and must stand up to rigorous investigation.

Section 1 – Input Packaging –Packaging Removed

In section 1, you are dealing with the packaging waste generated by your activities. This is waste arising on either your premises or that of a company contracted on your behalf e.g. (either a third party haulage company or a contract packer).

In the following, “you”, refers to either your own company, or a company contracted on your behalf...

1.1	Irish Sourced Input Packaging	Packaging removed from Irish sourced products
1.2	Imported Input Packaging	Packaging removed from imported products
1.3	Internal Packaging Waste Management	How you deal with your packaging waste

For each product arriving at your back door, can you provide it with a source tag? Do you know the weight of all associated packaging? Do you know how much packaging is removed?

If you cannot directly calculate the weights of packaging removed per product, look to your waste contractors, for the total weight of packaging recycled etc and work back. You may with reasonable estimation, apply a split between Irish sourced and imported, but this should stand up to the audit process.

Once you have calculated the packaging removed, what happens to it?

- Do you return the empty packaging to your supplier? – Any packaging returned to supplier, you should not report
- Do you remove the packaging from one product and apply it to another? Report this as **Onward Reuse** (i.e. report in 1.1 or 1.2 and do not report in section 2)
- Do you own the packaging and have it in a formalised **Reuse Loop** with your supplier? Reuse of packaging should be reported in section **1.1** or **1.2** or the form
- Do you use an **RPS Scheme** collector to have your back door packaging waste recycled? If yes, report under sub section 1 of 1.3. (please verify on www.repak.ie)
- Do you use a **Non-RPS Scheme** collector to have your back door packaging waste recycled? If yes, report under sub section 2 of 1.3. (please verify on www.repak.ie)
- Does your packaging get re-directed to a non packaging function with energy recovery? Report in section 1.3, under **Tonnes Directed to Recovery**

- Do you send the packaging waste to landfill? Report under sub section 4 of 1.3 under **Tonnes Directed to Disposal**

Example 1 – Input Packaging

You manufacture components for the electronics industry, with raw materials sourced at home and abroad.

Packaging you remove:

- Locally sourced goods are delivered in boxes, with pallet wrap and pallets
- One supplier uses **your** steel cages to deliver and you have an official reuse loop in place with him
- Plastic tote boxes are imported with air board, shrouded in plastic wrap (the boxes are returned to the supplier)
- Pallets removed are used again as packaging on another product

Irish sourced packaging removed – report in Section 1.1

- 1.003 tonnes of cardboard
- 3.000 tonnes of plastic
- 15.750 tonnes of wood
- 6 Tonnes of steel packaging from the cages. The attrition rate is calculated and a reuse value of 5 tonnes is then arrived at

Imported packaging removed – report in Section 1.2

- 6.000 tonnes tote boxes are returned to supplier – no need to report
- 2 tonnes plastic shroud removed

1.1 Irish Sourced Input Packaging

	Paper / Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paprr/Plas Comp	Metal Comp	Other
Total Tonnes: (Including Reuse Packaging) Reuse Packaging (Official Loop) Suitable for Continued Reuse	1.003			6.000	3.000	15.750			
				5.000					

Figure rounded to three decimal places

Reuse of steel cages

Pallets - 15 Tonnes -> onward reuse. Report at the Input stage only (either 1.1 or 1.2) report what goes to waste in 1.3. Don't report in section 2

1.2 Imported Input Packaging

	Paper / Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paprr/Plas Comp	Metal Comp	Other
Total Tonnes: (Including Reuse Packaging) Reuse Packaging (Official Loop) Suitable for Continued Reuse					2.000				

6 T Plastic drums returned to supplier. don't report

1.3* Internal Packaging Waste Management

	Paper / Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paprr/Plas Comp	Metal Comp	Other
Total Tonnes: (1 + 2 + 3 + 4) All Packaging Waste Arisings	1.003			1.000	5.000	0.750			
1 RPS Scheme Recycling	1.000			1.000	5.000				
2 Non-RPS Scheme Recycling						0.750			
3 Tonnes Directed to Recovery									
4** Tonnes Directed to Disposal	0.003								

Paper contaminated - Can't be recycled

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Section 2 – Output Packaging – *Packaging Applied/Supplied*

When calculating your obligation for Section 2, remember we are interested in the source, destination and amount of packaging going from you or your supplier (be they Irish sourced or imported) to your direct customer. All packaging removed by you should be reported in section 1.

First of all, look at your sales units.

- Do you have a system capable of reporting the total units sold in six months?
- What is the total associated packaging with each unit sold?
- Can you break down the packaging levels (primary, secondary or tertiary) with each product? (See below)
- For the packaging associated with more unusual products, is each item classified as packaging? For example, does it have another function other than packaging? This may then exclude it from your reporting obligations. For example, when a medical vial is used to administer an IV drip, then it can be excluded from the return form.
- What packaging does your customer remove?
 - Per sales unit, set up the packaging ratio
 - Allocate source and destination
 - Tag your obligations to each section
 - Relate the information to the different sections of the form

Packaging levels which can be removed – 1°, 2° and 3° packaging



1° Primary Packaging: - conceived so as to constitute a sales unit to the final user or consumer at the point of purchase. E.g. bottle, label, cap...

2° Secondary Packaging: - at the point of purchase, this acts to group a certain number of sales units whether the product is sold to the final user or consumer or whether it serves only as a means to replenish the shelves at the point of sale; it can be removed from the product without affecting its characteristics. E.g. cardboard around a six pack of beer



3° Tertiary Packaging: - facilitates handling and transport of a number of sales units or grouped packaging in order to prevent physical handling, transport damage etc. E.g. pallets and pallet wrap

Each sales unit of product would have 1°, 2° and 3° packaging associated with it.

- A manufacturer will remove primary, secondary and tertiary packaging from their raw materials **Input**
- They will apply primary, secondary and tertiary packaging to newly manufactured products **Output**
- A wholesaler will remove a small amount of tertiary packaging **Input**
- They may re-apply new tertiary packaging when they sell on **Output**
- A retailer will remove secondary and tertiary packaging (**Input**) and place the primary packaging associated with the product up on the shelf **Output**. They may provide secondary/tertiary packaging in the form of carrier bags etc **Output**

The Unit Packaging Ratio

Take the example of a box of chocolates sold in a shop.

- ❖ The Box is cardboard, with a plastic tray inside and plastic film on the outside
→Therefore the associated primary packaging is the total weight of plastic and cardboard per unit
- ❖ The manufacturer packs the good in large cardboard boxes (30 to a box) which can be loaded six per pallet
→The secondary packaging is cardboard
- ❖ The goods are delivered on pallets with wrap
→The tertiary packaging is wood and plastic

Take the completed pallet as the sales unit – Allocate the weight of the associated primary, secondary and tertiary packaging:

- ✓ Pallet – 19KG
- ✓ Wrap – 0.25KG
- ✓ 6 cardboard boxes – 6 x 2KG
- ✓ 6x30 individual boxes with wrap and trays – 6x30x0.1KG (cardboard) – 6x30x0.04KG (trays) - 6x30x0.01KG (individual wrap)

Calculate the associated weight per reporting period and allocate to the specific sections on the packaging data statistical return form.

To Calculate 1 Unit

	Tertiary Wood	Tertiary Plastic	Secondary Paper Cardboard	Primary Paper Carton	Primary Plastic Trays	Primary Plastic Film
(KGs) Pallet	19	0.25	2	0.1	0.04	0.01
Multiple	1	1	6	180	180	180
	19	0.25	12	18	7.2	1.8

Tonnes	
Total Paper	30
Total Plastic	9.25
Wood	19

- 10,000 units were sold
- 80% was delivered to customer
- The customer only removed the tertiary packaging

From this information you need to complete the packaging data statistical return form:

2.1 Irish Sourced Output Packaging Supplied in the Republic of Ireland

Total Tonnes: (Including Reuse Packaging)	Paper /	Glass	Alum.	Steel	Plastic	Wood	PapnPlas	Metal	Other
	Cardboard						Comp	Comp	
Materials Manufacturer									
Converter									
Brandholder	300.000				92.500	190.000			
Distributor	240.000				74.000	152.000			
Retailer					2.500	190.000			

