

REPAK STATISTICAL TRAINING COURSE

Packaging Statistical Return Form Information

Presentation Overview

- Legislation
- Why Statistics required
- Packaging terms
- Input Packaging
- Output Packaging
- Contact information

The Legislation



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- Irish Packaging Regulations came into force in 1997 in response to the EU Packaging Directive 94/62/EC
- Updated regulations came into effect in March 2003 and March 2008.
- Obliges all businesses with a turnover of greater than €1m AND placing 10 tonnes of packaging onto the Irish market to comply.
- Choice of joining Compliance Scheme - Repak or Self-Compliance

Why are Statistical Submissions required?

REPAK MUST

Report to the Dept. of Environment and EPA who in turn report to European Commission

YOUR Company MUST

Submit Statistical Returns online as a condition of Repak Membership - 21st August & 21st February.

INVOICE

Sole basis for your invoice, subject to min fee.

Statistical Submissions & Audits



YOUR RESPONSIBILITY

- System of Self-Certification
- **Audit Trail – KPMG.**
 - ✓ Correct Completion of Stats form
 - ✓ Supporting Documentation in place
 - ✓ Accurate Reporting System in place
 - ✓ Ensure all subsidiaries/ premises are captured

Contract Packing for ROI only

If an ROI company is packing products into your branded packaging, you must report all packaging associated with that at the brandholder, distributor and retailer level (in 2.1 or 2.3) as well as all input packaging.

If you are packing product into another (ROI) party's private label, do not report any packaging associated, neither input nor output. However, contract packing tonnes count in determining major producer status.

Packaging Terms

1. **Packaging** – (containment, transport, handling, protection, marketing or sale).
2. **Input Packaging** – (removal of packaging)
3. **Output Packaging** – (supply packaging to market)
4. **Shared Responsibility** – (5 stages in life-cycle of packaging)

Shared Responsibility

Life Cycle of Packaging

- **Materials Manufacturer**— makes or imports materials that will be used to make packaging
- **Converter** – makes packaging or imports empty packaging
- **Brandholder/Importer** – owns the brand-name, applies packaging or imports packaged product
- **Distributor** – 1st party to transport the packaged good in RoI
- **Retailer** – if your customer removes any/all the packaging (& doesn't supply it on to their customer), you are the retailer of what they remove.

Notes on Reporting

- All data **ALWAYS** reported in Metric Tonnes
- Data to 3 decimal places – nearest Kg
- CHEP pallets not to be reported as they are in a rental system
- 2 Types of Reuse:
Closed loop Reuse & Onward Reuse.

Re-use Packaging

Closed Loop



- Packaging must be conceived and designed for reuse
- Packaging must make minimum 2 trips or rotations
- Re-use loop must be documented

Onward Re-use



- Packing removed from product received
- Used to send product to customer
- Is not returned

Inputs and Outputs

Input Packaging

- Is removed by you or on your behalf
- Reported in Section 1 of form

Output Packaging

- Any packaging supplied by you or on your behalf to your customer
- Reported in Section 2 of form

Source and Destination

In order to decide which section of the form you need to report in, you should look at the source and destination of your packaging and packaged goods.

This is based on the paper/invoice/vat trail rather than where the goods are delivered from/to.

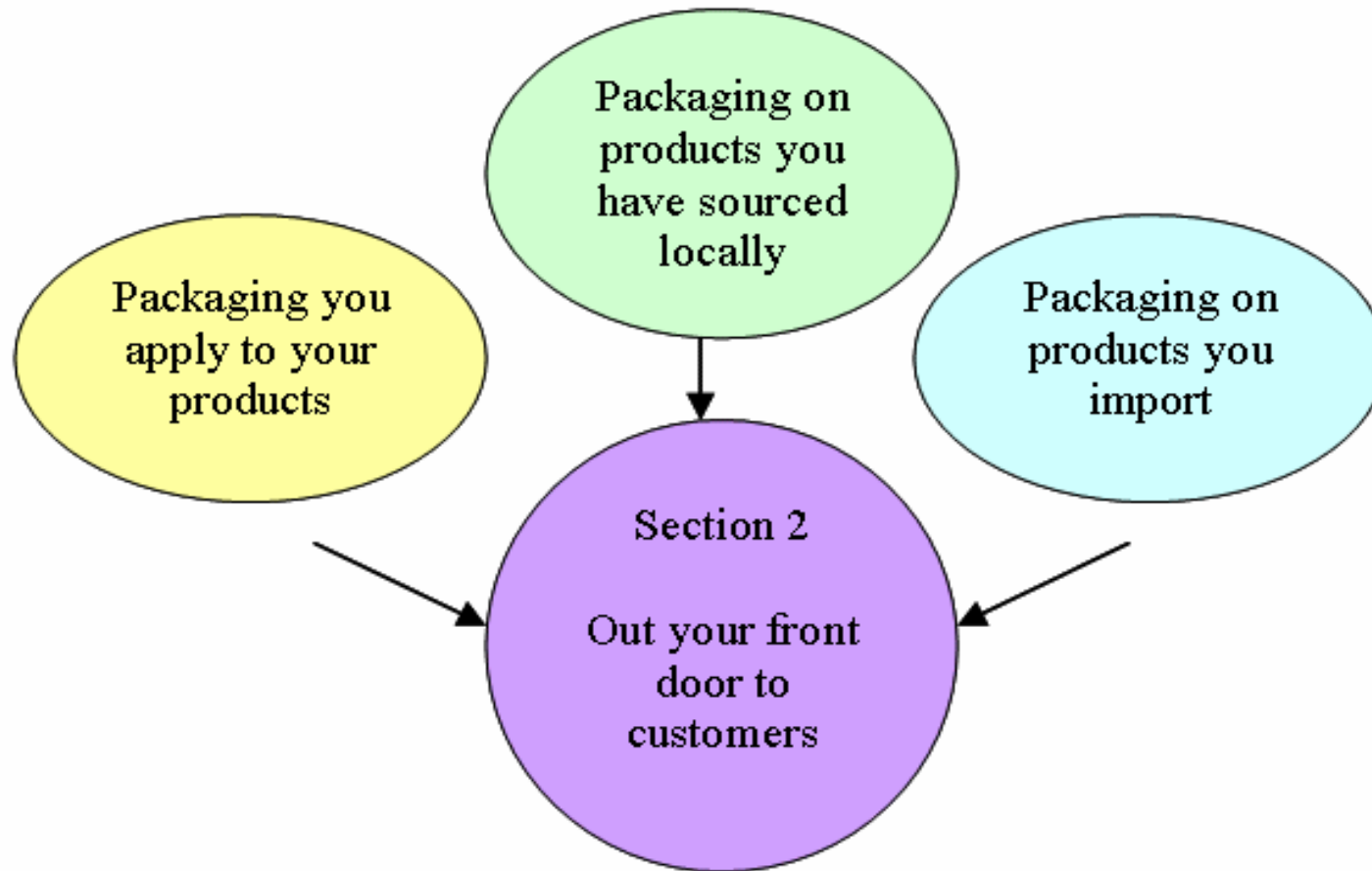
Who are your suppliers? Do they invoice from the ROI or are you the importer?

Where are your customers based? Do you sell to the Republic of Ireland or do you export?

Section 1: *Inputs*

- 1.1 Irish Sourced *Input* Packaging
(Supplier is RoI based)
- 1.2 Imported *Input* Packaging
(Supplier is based outside RoI)
- 1.3 Internal Packaging Waste
Management
What happens to this waste?
How is it disposed of?

Section 2: Where does the packaging come from?



Section 2: *Output Packaging*

Section 2.1

Irish Sourced Output Packaging_Supplied in RoI

Section 2.3

Imported Output Packaging_Supplied in the RoI

Sections 2.2+2.4

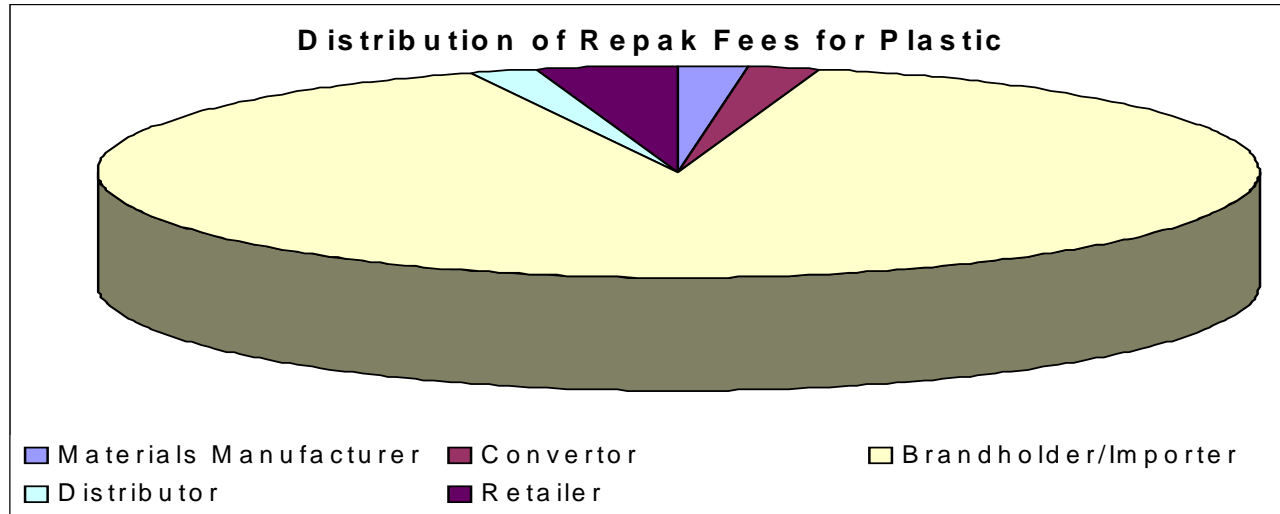
All Exports

Material Types

- Paper/Cardboard
- Glass
- Aluminium
- Steel
- Plastic
- Plastic Bottles
- Wood
- Paper/Plastic Composite
- Metal Composite
- Other

Composite: A packaging type that is made up of more than one material that is not mechanically separable. If the main material weighs less than 70% of the overall weight, report as a composite. If more than 70%, report all as the main material.

Half 1 '09 Repak Fee Structure



Materials Manufacturer	€2.05 per tonne
Converter	€2.05 per tonne
Brandholder or Brandholder/Importer Material Specific	
Paper	€22.70
Glass	€9.20
Alum.	€33.70
Steel	€78.50
Plastic	€9.16
Wood	€10.60
P Comp	€75.80
M Comp	€111.50
Distributor	€2.05 per tonne
Retailer	€4.10 per tonne

Packaging Levels

- Primary packaging is sales packaging, packaging that is right next to the product and you often can't sell the product without the primary packaging.
- Secondary packaging binds a number of primary units together.
- Tertiary packaging is transport packaging.

Note: It is not necessary to classify your packaging types as primary, secondary and tertiary but sometimes it can be helpful.

REPORTING

Members:

- Existing Members need to report online twice per year.

January – June: Statistics due by 21st August

July – December: Statistics due by 21st February

- Online Reporting – www.rols.ie *
- To view previous online submission – www.rols.ie/displaylogin.asp *
- *requires username and password
- Transparency sheet available on our website www.repak.ie

Annual Plans

As a Repak Member you are also asked to complete an Annual Plan each year. This is a written plan for the management of packaging waste arising on your premises.

The information you provide on this plan will be used as a cross check when you submit your statistics so please ensure the statistics person is involved in completing the annual plan.

ASSISTANCE

Repak Contacts

Membership / general queries

fiona.kelly@repak.ie

info@repak.ie

Specific Stats queries

brenda.keogh@repak.ie

stats@repak.ie

Potential members

ian.black@repak.ie

sandra.whelan@repak.ie

Repak Web Site: www.repak.ie

Potential Members

- Check if you were a “Major Producer” for each calendar year back to 1997.
- “Major Producers” have a turnover of >€1m (£1m prior to 2003) and place 10 tonnes or more of packaging on the ROI market p.a (25 tonnes prior to 2008).
- Pay backfee to Repak for all obligated years ie years you were a Major Producer.
- Early years fee based on turnover category.
- Fees from 1999/2000 based on previous years stats subject to minimum fees.

Potential Members

- Provide stats for obligated years (use workbook if you wish: e-mail to stats@repak.ie).
- Provide signed Auditors Declaration for years not obligated: fax to 01 4030929.
- Provide local authority certs for years in self-compliance.
- Repak will issue invoice, green dot licence agreement and membership rules.
- Once account is up to date with payments & stats, certs are issued (provide list of all premises as cert is required for each one.)

REPAK STATISTICAL TRAINING COURSE

Packaging Statistical Return Form Examples

Section 1 - Example

(Note: Process waste is NOT packaging and should not be reported on the form.)

→ You remove packaging from

- 1) raw materials,
- 2) empty packaging purchased and
- 3) products for onward sale

They are both ROI sourced and imported.

- Boxes, pallet wrap and pallets are removed from Irish sourced goods.
- One supplier uses your steel cages to deliver and you have a reuse loop in place with him.
- Plastic drums are imported. They are wrapped in plastic, the drums are returned to the supplier

Section 1

1.1 Irish Sourced Input Packaging

	Paper / Cardboard	Glass	Alum.	Steel	Plastic	Wood	Papir/Plas Comp	Metal Comp	Other
Total Tonnes: (Including Reuse Packaging)	1.003			6.000	3.000	15.750			
Reuse Packaging (Official Loop) Suitable for Continued Reuse				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	Papir Comp	Metal Comp	Other
Total Tonnes: (Including Reuse Packaging)					2.000				
Reuse Packaging (Official Loop) Suitable for Continued Reuse									

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

1.3* Internal Packaging Waste Management

	Paper / Cardboard	Glass	Alum.	Steel	Plastic	Wood	Papir/Plst 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 2.1 – Example of Brandholder

You manufacture your branded products and wrap them in plastic, pack them in cardboard boxes and put them on pallets with shrink wrap.

All products are sold in ROI. The plastic and pallets are purchased in ROI – Section 2.1 of form. (The boxes do not go in Section 2.1 as they are not Irish sourced.)

You report as follows:

- You are the **Brandholder** for all ROI packaging associated with products you own the brand name of.
- As you deliver all goods to your customer report 100% of the Brandholder figures on the **Distributor** line.
- You sell to customers that remove *all* packaging. This is reported on the **Retailer** line.

This is based purely on packaged products *you* own the brand name of, you are the *first* to transport all packaged goods and *all* packaging is removed by your customer. Only report ROI packaging in 2.1.

2.1 Irish Sourced Output Packaging_Supplied in the Republic of Ireland										
Total Tonnes: (Including Reuse Packaging)		Paper	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Materials Manufacturer									
	Converter									
	Brandholder					14.500	2.000			
	Distributor					14.500	2.000			
	Retailer					14.500	2.000			
Reuse Packaging Suitable for Continued Reuse		Paper	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Brandholder									
	Distributor									
	Retailer									

Primary:

Plastic wrap 14t

Secondary:

Cardboard Boxes: 3t

Tertiary:

Shrink wrap: 0.5t;

Wood: 2t



Section 2.1 – Example of sourcing product in ROI for onward sale.

You source products from ROI suppliers.

- They are wrapped in plastic and cardboard boxes.
- Your suppliers deliver to you.
- You sell the products to the end user.

→ You are **not** the Brandholder of the packaging on the products as you did not apply it and you do not own the brand name.

→ You are **not** the Distributor as you are not the first party to transport the packaged good in ROI.

→ Report as **Retailer** for the packaging around the product that is removed by your customer.

In this example, the goods are sourced from an Irish supplier that delivers the packaged goods to you. All packaging on the product is *removed* by your customer.

2.1 Irish Sourced Output Packaging_Supplied in the Republic of Ireland										
Total Tonnes: (Including Reuse Packaging)		Paper/ Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Materials Manufacturer									
	Converter									
	Brandholder									
	Distributor									
	Retailer	1.000				5.000				
Reuse Packaging Suitable for Continued Reuse		Paper/ Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Brandholder									
	Distributor									
	Retailer									

Cardboard Boxes: 1t

Plastic wrapping: 5t

Section 2.1

Example of adding on packaging

You buy paper bags and shrink wrap (from an Irish supplier) to apply to products you have manufactured / purchased for onward sale. (Section 2.1 for the paper/cardboard & plastic as it was purchased from an Irish supplier.)

You report this paper/cardboard and plastic as follows:

→ Report as **Brandholder** for all packaging you apply.

→ You deliver to most of your customers but 1 collects accounting for 10%. Report 90% as **Distributor**.

→ Your customers remove the bags and shrink wrap.

This is reported as **Retailer**.

This is based purely on packaging you apply, you are the *first* to transport 90% of packaged goods (10% is collected) and the paper/cardboard and shrink are removed by your customer.

2.1 Irish Sourced Output Packaging_Supplied in the Republic of Ireland										
Total Tonnes: (Including Reuse Packaging)		Paper/Car dboard	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Materials Manufacturer									
	Converter									
	Brandholder	5.000				1.250				
	Distributor	4.500				1.125				
	Retailer	5.000				1.250				
Reuse Packaging Suitable for Continued Reuse		Paper	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Brandholder									
	Distributor									
	Retailer									

(Shrink wrap example: You purchase 250 rolls in 6 months. Each roll weighs 5.3kgs. The core weighs .3kgs therefore the plastic wrap weighs 5kgs x 250 = 1.25 tonnes)

Section 1.2 & 2.3 – Importing Products

- You import a range of goods and sell to shops in ROI (2.3). The associated packaging is:
 - Primary packaging includes glass bottles, paper labels, steel caps and aluminium cans.
 - The goods are grouped in larger cardboard boxes and delivered on Chep pallets with pallet wrap. The pallet wrap and pallets are removed by you and should be reported in section 1.2. The balance is reported in section 2.3
- You deliver to the retail outlets.
- The outer cardboard box is removed by the shop.
 - Report packaging you remove in Section 1 of the form and packaging sold on to the customer in Section 2 of the form.
 - Report as Brandholder/Importer in 2.3 for all the packaging around the product that goes on to your customer.
 - You are the Distributor as you deliver to your customer.
 - Report as Retailer for the packaging that your customer removes i.e. the outer cardboard box.

Packaging on goods you import and sell on? You remove the tertiary packaging. You deliver to your customer who removes all secondary packaging.

1.2 Imported Input Packaging										
		Paper	Glass	Alum.	Steel	Plastic	Wood	CompA	CompB	Other
Total Tonnes: (Including Reuse Packaging)						2.000				
Reuse Packaging Suitable for Continued Reuse										

2.3 Imported Output Packaging_Supplied in the Republic of Ireland										
		Paper	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
Total Tonnes: (Including Reuse Packaging)										
	Materials Manufacturer									
	Converter									
	Brandholder/Importer	25.300	200.000	80.000	1.500					
	Distributor	25.300	200.000	80.000	1.500					
	Retailer	25.000								

Primary: paper: 0.3t; glass: 200t; alum: 80t; steel: 1.5t.
 Secondary: cardboard: 25 tonnes.
 Tertiary: plastic: 2t; wood (CHEP): 30t.

Section 2.3 Importing Packaging.

You import glass bottles and cardboard boxes to pack goods.

You sell to wholesalers (30%) and shops (70%).

- The bottles and boxes are reported on the **Converter** line as you are importing empty packaging.
- Report as **Brandholder** as you apply this packaging.
- Report as **Distributor** as you deliver to you customers.
- Report as **Retailer** if your customer removes the packaging and does not sell it on i.e. 0 for glass bottles and just the proportion of boxes sold to shops.

2.3 Imported Output Packaging_Supplied in the Republic of Ireland									
Total Tonnes: (Including Reuse Packaging)	Paper	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
Materials Manufacturer									
Converter	50.000	200.000							
Brandholder/Importer	50.000	200.000							
Distributor	50.000	200.000							
Retailer	35.000								

In this example, there is reuse of plastic totes, this is based on sales against waste and you are only charged for what goes to waste (5 tonnes in this case).

2.1 Irish Sourced Output Packaging_Supplied in the Republic of Ireland										
Total Tonnes: (Including Reuse Packaging)		Paper/ Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Materials Manufacturer									
	Converter									
	Brandholder					100.000				
	Distributor					100.000				
	Retailer					100.000				
Reuse Packaging Suitable for Continued Reuse		Paper/ Cardboard	Glass	Alum.	Steel	Plastic	Wood	Paper Comp	Metal Comp	Other
	Brandholder					95.00				
	Distributor					95.00				
	Retailer					95.00				

Section 2.2+2.4 All Exports

Exporting empty and filled packaging...

2.2 + 2.4 All Exports

Total Tonnes: (Including Reuse Packaging)	Paper /						Papri/Plas	Metal	
	Cardboard	Glass	Alum.	Steel	Plastic	Wood	Comp	Comp	Other
Empty Packaging		100.000							
Filled Packaging	22.000				17.000				
Reuse Packaging (Official Loop) Suitable for Continued Reuse	Paper /						Papri/Plas	Metal	
	Cardboard	Glass	Alum.	Steel	Plastic	Wood	Comp	Comp	Other
Filled Packaging									

Exporting empty glass bottles in cardboard boxes with plastic wrap.

In summary:

- Inputs and Outputs – 2 different concepts, 2 different sections
- Packaging on your products, generally report from Brandholder or Brandholder/Importer down
- Most companies, report some figures in the Brandholder or Brandholder/Importer sections
- Only report what you own
 - Don't report CHEP pallets on the form
- Report all figures in metric tonnes to 3 decimal places

Please note that a training section has now been placed on our website: www.repak.ie This contains additional examples that are sector specific