

Northern Ireland
Consultation for the
**Reduction of
Single-Use
Plastic Beverage
Cups and Food
Containers**



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1.0 Overview

1.1 Glossary

CMA - Competition and Markets Authority
DRS - Deposit Return Scheme
EPR - Extended Producer Responsibility
EU - European Union
IA - Impact assessment
LCA - Life cycle assessment
NGO - Non-governmental organisation
NI - Northern Ireland
MU - Multi-use
PPT - Plastic Packaging Tax
PVC - Polyvinyl chloride
SUNPs - Single-use non-plastics
SUPs - Single-use plastics

1.2 General approach

The purpose of the consultation was to seek stakeholders' views on the 3 policy options presented: a voluntary scheme, levy and a ban, in reducing the consumption of single-use plastic (SUP) beverage cups and food containers in Northern Ireland (NI), by encouraging wider take up of multi-use (MU) and/or single-use non-plastic (SUNP) alternatives. 37 questions were designed to gauge respondent views on different aspects of each of the policy options. The results of the consultation will be used to determine the most effective and practical policy option, which may help to frame possible measures promoting the reduction of SUP items.

The consultation was promoted widely, particularly through all the relevant stakeholder groups who have an interest in the subject area. Stakeholders were contacted using contact lists held by DAERA. Workshops were held to raise awareness of the consultation and to provide a platform for discussion in advance of consultees submitting their responses.

The consultation was launched using NI Direct Citizen Space digital platform, a platform widely used for consultations to collate and standardise responses from all potential stakeholders. 150 responses were received. 107 responses were submitted via NI Direct Citizen Space consultation webpage. 43 submissions were received separately via email and were inputted manually to allow fair comparison and analysis to be undertaken.



1.3 Layout of consultation questions

In the NI Direct Citizen Space digital platform, the narrative and questions were structured to allow full responses. Consultees were able to separately submit evidence in support of their response, though analysis of all supplementary data is not included in the report due to time constraints and lack of relation to the consultation in some cases. Alongside the main consultation document, respondents were provided with 3 accompanying documents, summarising the strategic context and scope of the consultation, as well as referencing associated evidence and 'An introduction to the Single-Use Plastics Assessment Framework'. The consultation was structured in 7 sections, comprising a variety of question types, the majority of these being single or multiple-choice. Most questions included an opportunity for respondents to follow up in free form text boxes capturing further insights. Respondents were not required to answer all questions but were encouraged to navigate to the sections that were of most relevance to them.

1.4 Layout of the responses in this summary

A contents page has been created to help readers navigate to the areas of interest. The report has 8 sections, following a similar structure to the consultation document.

For each question, an overview of the total respondent count and percentage is first laid out in bullet points. Depending on the question type, these results are then presented in bar charts and/or tables. For single choice questions, a bar chart is split by stakeholder group. For multiple-choice questions, a bar chart presenting the total respondent count precedes a table split by stakeholder group. Respondent count by stakeholder group are presented to the right of each bar on the charts.

The majority of questions in the consultation have a qualitative element to allow greater insight and depth to responses. These were either formatted as a follow up question, asking the respondent to expand on an answer, or a purely qualitative question. For both types of qualitative question, a coding method was used to analyse responses. Comments were first reviewed and grouped into key themes extracted from the text, then summarised and outlined in a text paragraph or bullet points. The number of respondents answering the question and leaving a comment is outlined, as well as the respondent count for each major theme, found in the text or in brackets. Note, respondents may have covered multiple themes in their comments and therefore the number of responses may be higher than the respondent count for a question. Note, in some cases, where near identical responses were received from several stakeholders, responses were reviewed and each treated as an individual response to the consultation. In these circumstances, this is highlighted to the reader.

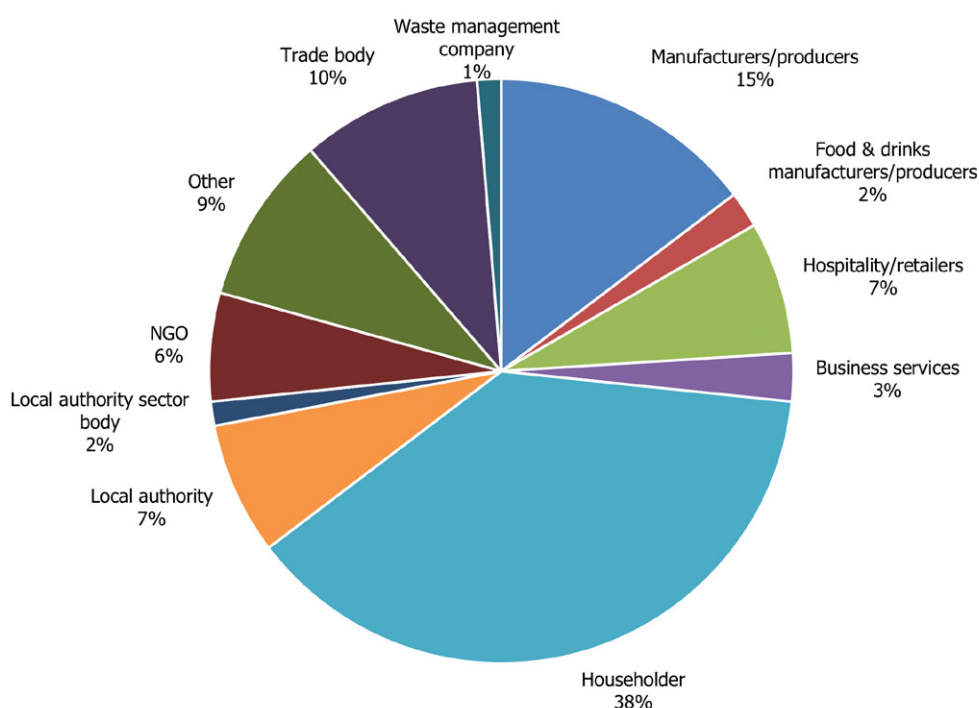


1.5 Categorising respondents

Categorising respondents enables a further review of stakeholder responses particularly to help DAERA greater understand the context behind perspectives. Respondents were categorised by the report’s author, calling on subject matter expert insights where conflicts or ambiguity arose. The Appendix, in section 9.0, lists the categorisation of the respondents. Where respondents could not easily be categorised an ‘Other’ category was available. Businesses were split into 4 sub-groups in order to achieve more granular insights, these being Manufacturers/producers, Food & drinks manufacturers/producers, Hospitality/retailers and Business services - a business that’s primary value is intangible. The proportion of respondents by category is shown in **Figure 1**.

Manufacturers/producers	15%
Food & drinks manufacturers/producers	2%
Hospitality/retailers	7%
Business services	3%
Householder	38% - respondents may not all necessarily be from NI
Local authority	7%
Local authority sector body	1%
NGO	6%
Other	9%
Trade body	10%
Waste management company	1%

Figure 1: Respondents by category that answered the consultation document





2.0 General questions on approach

Question 4. What size of businesses should the proposed policies apply to? (Multiple-choice)

This question was asked as the proposed policies could affect businesses of all sizes in NI, from large multinationals to small local businesses and the size of the organisation affected could alter the potential impact of the policies.

Small (1-49 employees):	99 responses (67%)
Medium (50-249 employees):	105 responses (71%)
Large (250+ employees):	111 responses (76%)
None of the above:	32 responses (22%)
Not answered:	3 responses (2%)

Figure 2: What size of businesses should the proposed policies apply to?
(Multiple-choice)

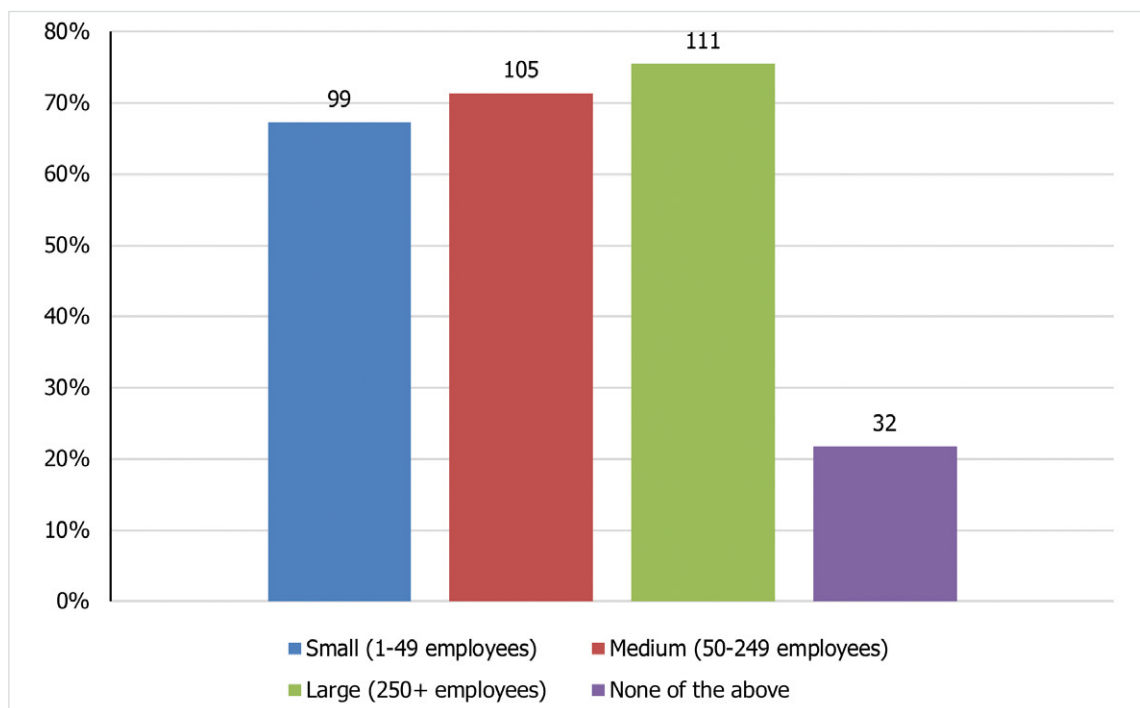


Figure 2 shows the total number of respondents selecting the sizes of business they thought the proposed policies should apply to and is based only on those who answered (i.e. excludes 'Not Answered'). 76% of respondents agree that the policies should apply to 'Large (250+ employees)' businesses. 71% of respondents agree that policies should apply to 'Medium (50-249 employees)' businesses and 67% of respondents for 'Small (1-49 employees)' businesses. 22% of total respondents selected 'None of the above'.



Table 1 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). The majority of respondent categories: Food & drinks manufacturers/producers; Local authorities; Local authority sector bodies; NGOs; Trade bodies and Waste management companies agree that the proposed policies should apply to each of the business sizes equally, excluding instances when the respondent selected 'None of the above'. In each category except Manufacturers/producers, the majority of respondents selected at least one of the business sizes. 64% of Manufacturers/producers selected 'None of the above'.

Table 1: Percentage by respondent type (*Multiple-choice*)

Percentage by Respondent Type	Small (1-49 employees)	Medium (50-249 employees)	Large (250+ employees)	None of the above	Not answered	Total answered (count)
Manufacturers/producers	14%	18%	36%	64%	0%	22
Food & drinks manufacturers/producers	67%	67%	67%	33%	0%	3
Hospitality/retailers	73%	64%	64%	36%	0%	11
Business services	75%	50%	50%	25%	0%	4
Householder	73%	84%	86%	11%	2%	56
Local authority	100%	100%	100%	0%	0%	11
Local authority sector body	50%	50%	50%	50%	0%	2
NGO	89%	89%	89%	11%	0%	9
Other	85%	92%	100%	0%	7%	13
Trade body	64%	64%	64%	29%	7%	14
Waste management company	100%	100%	100%	0%	0%	2



Question 5. Are you aware of any other policy options, not including those already listed, that would be suitable to achieve the stated policy aims? (Single choice)

The primary objective of the proposals is to influence customer behaviour to promote a significant reduction in usage of SUP beverage cups and food containers. The 3 proposed policies selected for this consultation: a voluntary scheme, a levy and a ban, are broad and have seen use elsewhere, however, they are not completely exhaustive. This question was asked to gather respondent awareness of other policies that could also achieve the stated policy aims.

Yes:	72 responses (48%)
No:	71 responses (47%)
Not answered:	7 responses (5%)

Figure 3: Are you aware of any other policy options, not including those already listed, that would be suitable to achieve the stated policy aims? (Single choice)

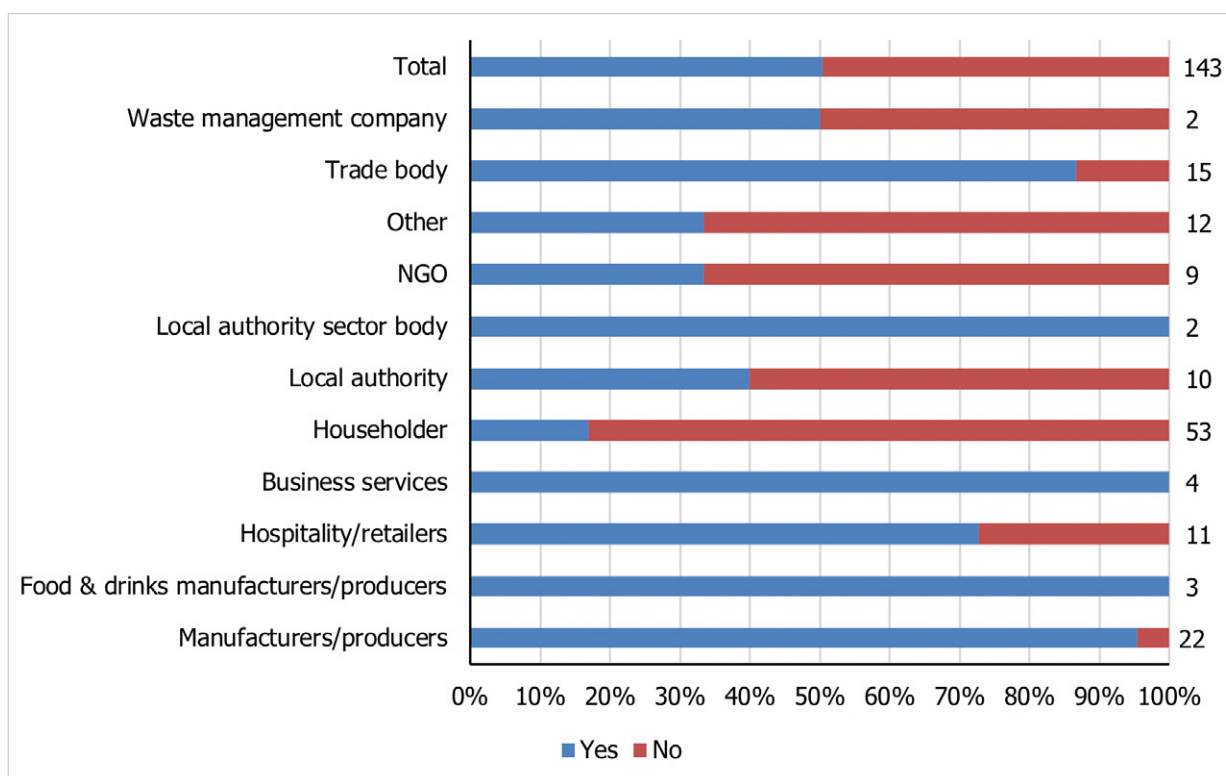


Figure 3 shows the split of responses by Respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). In total across all respondent categories, there is a near even divide in the number of respondents aware and unaware of any other policy options. 48% answered 'Yes', whilst 47% answered 'No'.

The majority of Local authorities (55%), Other (57%), NGOs (67%) and Householders (77%) selected 'No' and were not aware of any other policies suitable to achieve the aims outlined in the consultation. A greater majority of the 4 business sub-categories: Manufacturers/producers (95%); Food & drinks manufacturers/producers (100%); Hospitality/retailers (73%) and Business



services (100%), alongside Local authority sector bodies (100%), Trade bodies (87%) and Waste management companies (50%) were aware of other policies, selecting 'Yes'.

Respondents who answered 'Yes' were asked to explain their choice:

72 respondents answered 'Yes' and 65 left comments.

46 respondents commented under the theme of Extended Producer Responsibility (EPR). Mostly under an identical response, 30 respondents refer to the mandatory take-back scheme proposal under EPR. Respondents view a mandatory take-back scheme as an effective measure in increasing collections and recycling of SUP items, without financially impacting the hospitality sector. 2 respondents raise the need for alignment of NI SUP policy to EPR. Other general comments support EPR, stating that EPR will be comprehensive, rather than a targeted policy for specific items.

The Deposit Return Scheme (DRS) was mentioned by 10 respondents. These respondents highlight the need for alignment of NI SUP policy to DRS.

The need for education/communications, as part of the SUP policy was highlighted by 10 respondents.

The EU directive on SUPs was commented on by 10 respondents. Here, respondents suggest NI follow the EU directive by banning non-recyclable expanded polystyrene/PVC and oxo-degradable plastics.

The Plastic Packaging Tax (PPT) was mentioned by 9 respondents. These respondents highlight the need for alignment of NI SUP policy to PPT.

Littering was mentioned by 8 respondents. Respondents state the need for NI SUP policy to tackle and enforce littering.



3.0 Materials in scope

Question 6. Which of following items, if any, should be included within the scope of proposed policy measures? (Multiple-choice)

Please refer to the Scoping Document to view product types and materials in scope. The 3 proposed policies are modelled for both SUP cups and food containers. Food containers have been divided into 2 scopes, Scope 1 and Scope 2. It is proposed that only Scope 1 food containers should be included within the ambit of the policies at the moment. The rationale for this is that in the case of Scope 2 food containers (a) the consumer has no opportunity to choose to have the food put into a multi-use container and thereby avoid the impact of the policy, and (b) SUNP alternatives are not readily available to producers/retailers in all cases.

Plastic single-use cups:	95 responses (65%)
Card single-use cups lined with plastic:	94 responses (64%)
Takeaway food containers (food containers provided with meals purchased to take off the premises) - Scope 1:	95 responses (65%)
Pre-filled food containers - Scope 2:	81 responses (55%)
Self-fill food containers (food containers that the customers fill themselves before purchase e.g. at a salad bar) - Scope 1:	90 responses (61%)
Other:	63 responses (43%)
Not answered:	3 responses (2%)



Figure 4: Which of following items, if any, should be included within the scope of proposed policy measures? (Multiple-choice)

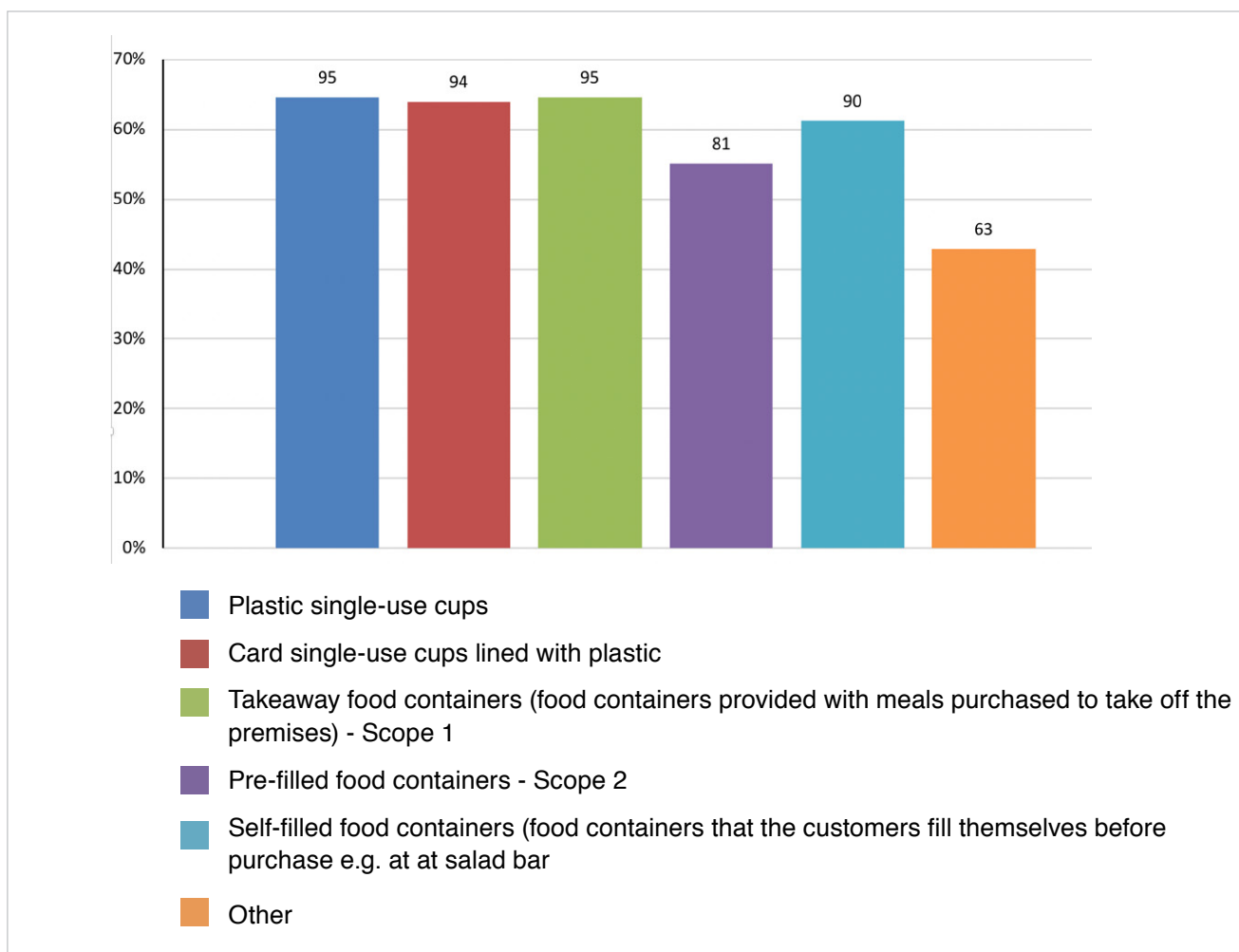


Figure 4 shows the total number of respondents selecting items listed in question 6 that they thought should be included within the scope of the proposed policy measures and is based only on those who answered (i.e. excludes 'Not Answered'). Across respondents, each container cup and container type received similar response rates. With regards to the cups listed, both received similarly high response rates, with 65% of respondents selecting 'Plastic single-use cups' and 64% selecting 'Card single-use cups lined with plastic'. 'Takeaway food containers (food containers provided with meals purchased to take off the premises) - Scope 1' and '-fill food containers (food containers that the customers fill themselves before purchase e.g. at a salad bar) - Scope 1' received higher response rates than 'Pre-filled food containers - Scope 2', with 65%, 61% and 55% respectively. 'Other' - detailed below, was selected by 43% of total respondents.

Table 2 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). By respondent type, over 62% of all Householders, Local authorities, Local authority sector bodies, NGOs and Other selected each cup and container type listed. The majority of Business services (67%) selected each



container type, though 33% of business services selected each of the cup types. Each cup and container type received low response rates from Manufacturers/producers and Food & drinks manufacturers/producers, ranging between 0% to 9%. These category types, alongside Hospitality/retailers and Trade bodies made up the majority of 'Other'.

Respondents who answered 'Other' were asked to explain their choice:

63 respondents answered 'Other', and 62 left a comment.

29 respondents left identical responses, stating that they do not agree with the proposed policy measures. They argue that there is a risk that policies will not align with models seen in other UK nations, where the EU SUP directive is being used as the basic model (Note: Several Defra Ministers have stated that the UK will meet or exceed EU standards where economically feasible). These comments also note that the items in scope for this legislation would fall under upcoming EPR and PPT and that banning or restricting these SUP items would have a knock on, detrimental effect on recycling as a whole (Note: The primary policy goal for EPR and PPT are better waste management and increased plastic recycling respectively. The primary driver for the policy proposed by this consultation is a reduction in consumption of the single-use plastic items in scope).

11 respondents shared materials they believed should be included within the scope of proposed policy measures. Of these, respondents suggested that plastic bottles, plastic cutlery, plastic straws and plastic packaging for fruit and vegetables in supermarkets should be included in scope.



Table 2: Percentage by respondent type (Multiple-choice)

Percentage by Respondent Type	Plastic single-use cups	Card single-use cups lined with plastic	Takeaway food containers - Scope 1	Pre-filled food containers - Scope 2	Self-fill food containers - Scope 1	Other	Not answered	Total answered (count)
Manufacturers/producers	9%	9%	9%	9%	9%	91%	0%	22
Food & drinks manufacturers/producers	0%	0%	0%	0%	0%	100%	0%	3
Hospitality/retailers	18%	18%	18%	18%	27%	73%	0%	11
Business services	33%	33%	67%	67%	67%	33%	25%	3
Householder	89%	86%	86%	81%	86%	16%	0%	57
Local authority	100%	100%	100%	73%	82%	27%	0%	11
Local authority sector body	100%	100%	100%	100%	100%	100%	50%	1
NGO	100%	100%	100%	100%	100%	44%	0%	9
Other	85%	92%	100%	62%	77%	23%	7%	13
Trade body	33%	33%	27%	20%	27%	73%	0%	15
Waste management company	100%	100%	100%	0%	50%	0%	0%	2



Question 7. In your view is it practical to include pre-filled (Scope 2) plastic food containers, including those which are plastic-lined, within the scope of these policies? (Single choice)

As stated, it is proposed that Scope 2 food containers should be excluded within the ambit of the policies at the moment. This question was asked to gauge consultee’s views on the matter.

Yes:	76 responses (51%)
No:	59 responses (39%)
Don't know:	11 responses (7%)
Not answered:	4 responses (3%)

Figure 5: In your view is it practical to include pre-filled (Scope 2) plastic food containers, including those which are plastic lined, within the scope of these policies (Single choice)

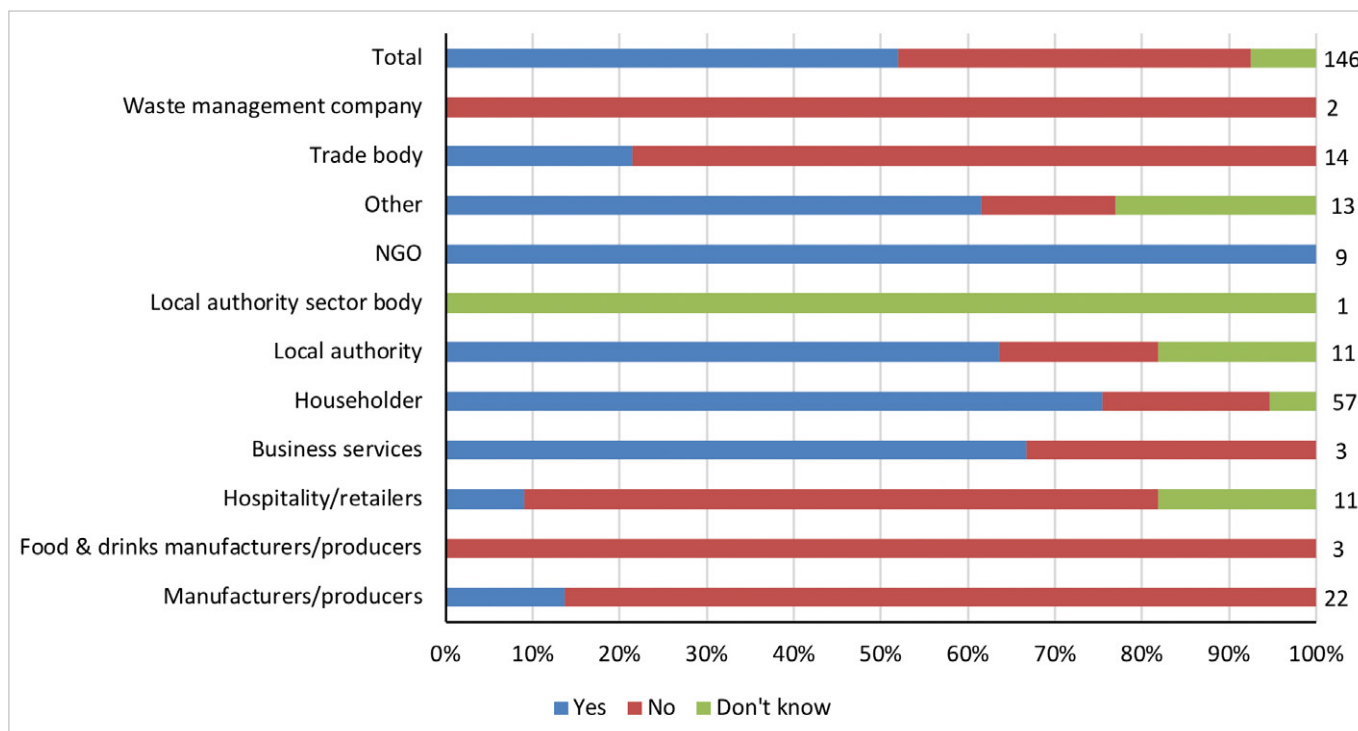


Figure 5 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes ‘Not Answered’). The majority of total respondents answered ‘Yes’, that it is practical to include pre-filled (Scope 2) plastic food containers within the scope of the proposed policies. 39% of respondents answered ‘No’. ‘Don’t know’ received the lowest response rate (7%).

By respondent category, ‘Yes’ received the highest response rates from Business services (50%), Householders (75%), Local authorities (64%), NGOs (100%) and Other (57%). ‘No’ received the highest response rates from Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (73%), Trade bodies (73%) and Waste management companies (100%).



Respondents who answered ‘yes’ were asked to explain their choice:

76 respondents answered ‘Yes’, 56 left a comment.

15 respondents stated that it is practical for Scope 2 containers to be included within the proposed policies, if effective SUNP and multi-use alternatives are available. Along similar lines, 4 other respondents noted that the addition of pre-filled food containers would encourage producers to innovate.

6 respondents argued that the inclusion of Scope 2 food containers would steer consumers away from convenient consumption and promote positive behavioural change.

6 respondents answered ‘Yes’, as they believe all SUP plastics and non-recyclable packaging should be banned or restricted.

Question 8. In addition to plastic, should any other materials be included in future measures? (Multiple-choice)

The current proposed measures focus on plastics for the reasons outlined in the consultation. In the future, further measures or updates may expand to cover other materials. This question attempts to determine materials of interest.

Metal:	39 responses (27%)
Glass:	40 responses (27%)
Paper/card:	32 responses (22%)
None of the above:	70 responses (48%)
Other:	46 responses (32%)
Not answered:	4 responses (3%)



Figure 6: In addition to plastic, should any other materials be included in future measures?
(Multiple-choice)

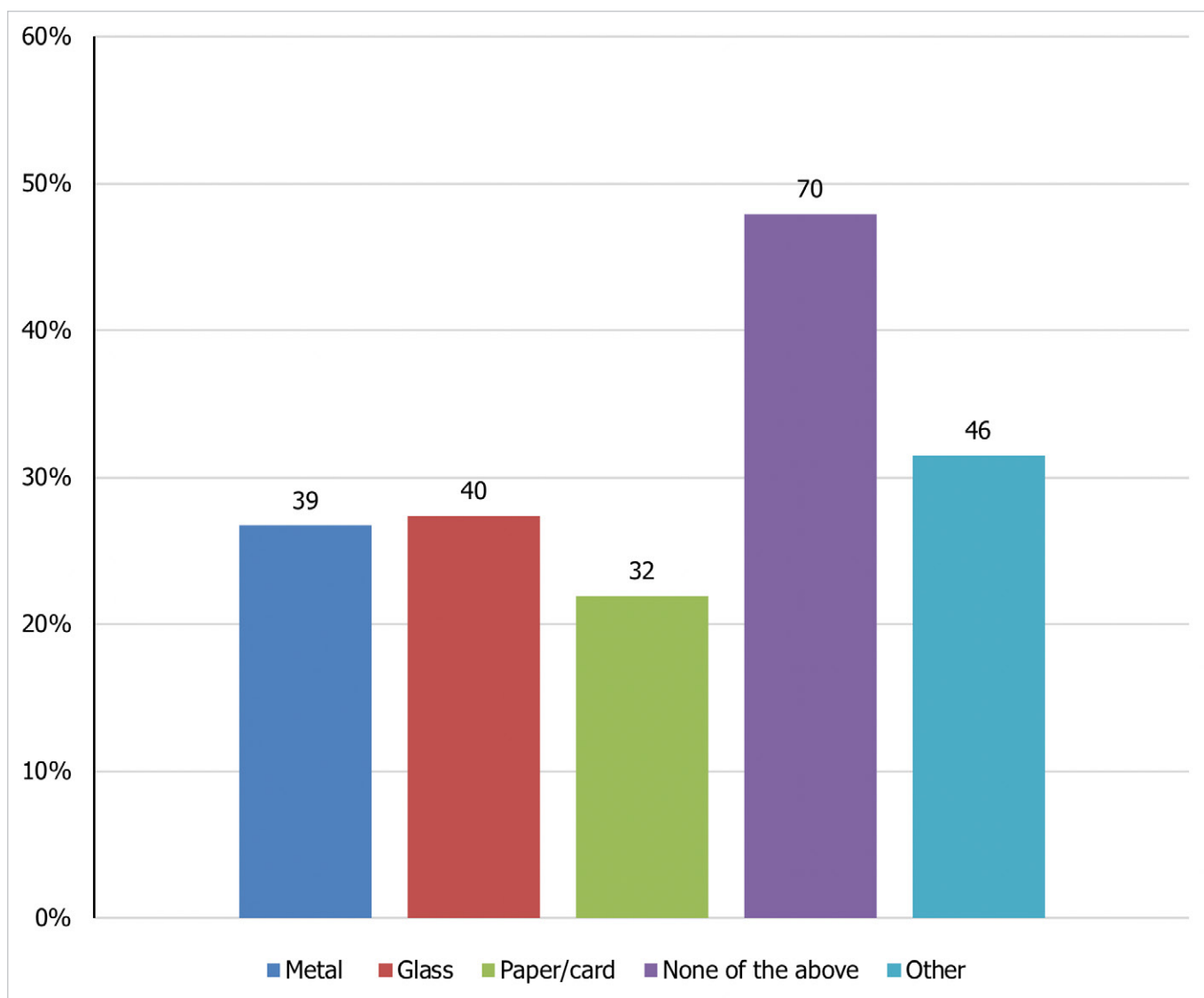


Figure 6 shows the total number of respondents selecting other materials they thought should be included in future measures and is based only on those who answered (i.e. excludes ‘Not Answered’). Across all respondents, there was a low response rate across all materials listed in the question. 27% of respondents selected both ‘Metal’ and ‘Glass’, followed by ‘Paper/card’ (22%). ‘None of the above’ received the highest response rate (48%). ‘Other’ - detailed below, was answered by 32% of respondents.

Table 3 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes ‘Not answered’). ‘Metal’, ‘Glass’ and ‘Paper/card’ did not receive a high response rate from any respondent types, apart from NGOs. 56% of NGOs selected each material listed. The majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (73%), Trade bodies (57%) and Waste management companies (100%) selected ‘None of the above’. There were low response rates from Local authorities, Other and Householders on each of the options listed in the question.



Respondents who answered ‘Other’ were asked to explain their choice:

46 respondents answered ‘Other’ and left a comment.

31 respondents, including an identical response (19), stated that all single-use materials should be included in future measures, noting that switching to alternatives does not resolve the litter issue and does not address the potential environmental impact of alternatives, such as increased carbon and food waste.

A number of respondents suggested other materials, however there were no major themes found. Suggestions include polystyrene, materials coated with per- and polyfluoroalkyl substances and compostable packaging. Note, single-use compostable cups and food containers coated with plant based plastics are already within the scope of the proposed policies.

Table 3: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	Metal	Glass	Paper/ card	None of the above	Other	Not answered	Total answered (count)
Manufacturers/ producers	18%	18%	18%	82%	68%	0%	22
Food & drinks manufacturers/ producers	0%	0%	0%	100%	33%	0%	3
Hospitality/retailers	18%	18%	9%	73%	45%	0%	11
Business services	33%	33%	0%	33%	67%	25%	3
Householder	26%	35%	26%	42%	14%	0%	57
Local authority	36%	9%	9%	18%	27%	0%	11
Local authority sector body	0%	0%	0%	0%	0%	50%	1
NGO	56%	56%	56%	11%	33%	0%	9
Other	31%	23%	15%	23%	23%	7%	13
Trade body	29%	29%	29%	57%	43%	7%	14
Waste management company	0%	0%	0%	100%	0%	0%	2



Question 9. If a levy were to be introduced, who should pay it, producers or consumers?
(Single choice)

In the proposed measure the levy is applied at the point of purchase and targeted at consumers. The levy could instead be placed on producers, this would mean the levy was less visible. Producers could still potentially pass the levy onto consumers, but the levy would be combined into the total price of the product.

Consumers:	53 responses (35%)
Producers:	39 responses (26%)
Other:	54 responses (36%)
Not answered:	4 responses (3%)

Figure 7: If a levy were to be introduced, who should pay it, producers or consumers?
(Single choice)

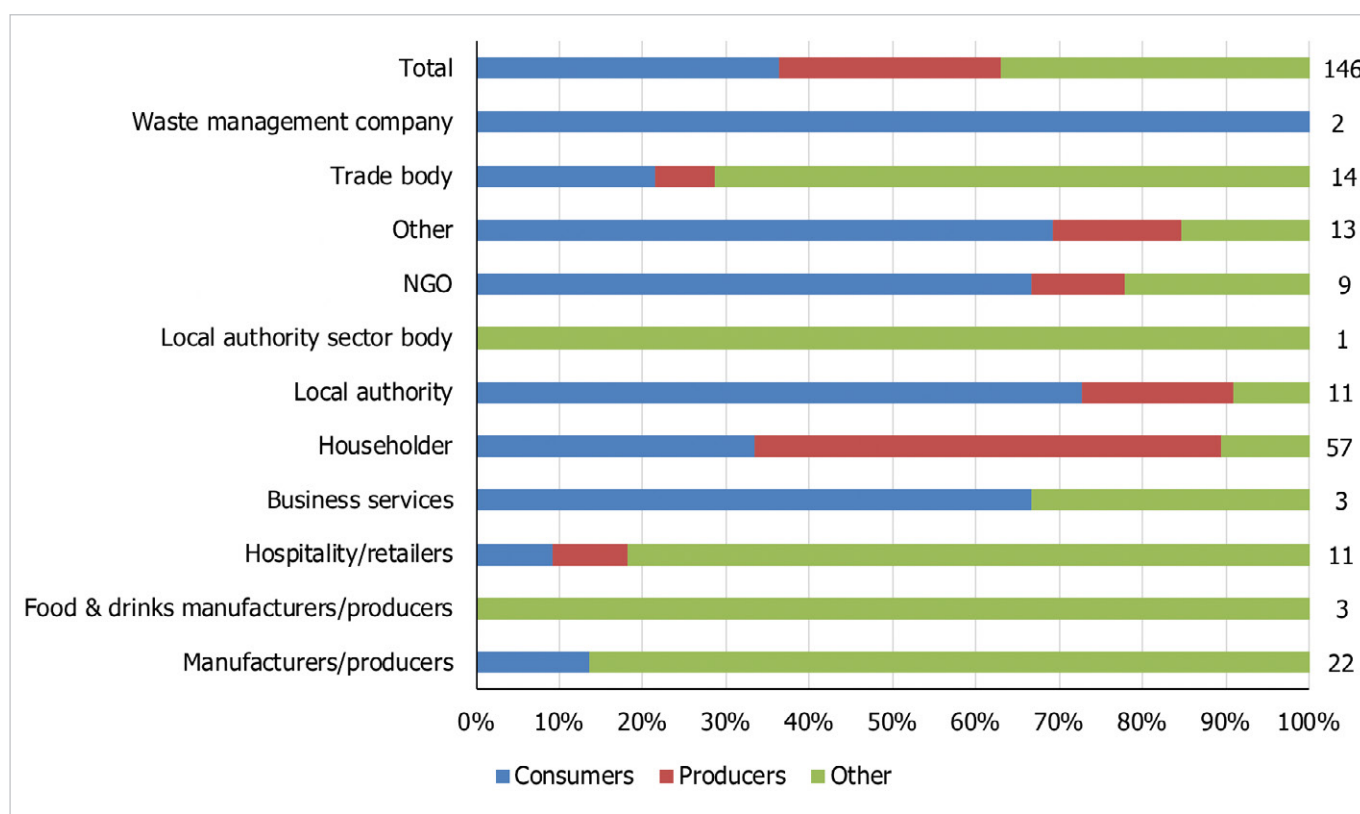


Figure 7 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Across respondents there was a mixed response. 'Other' - detailed below, received the highest response rate (36%). Out of 'Consumers' and 'Producers', 'Consumers' received the highest response rate (35%). 26% of respondents answered 'Producers'.

By respondent category, 'Consumers' received the highest responses from Business services (50%), Waste management companies (100%), Local authorities (73%), NGOs (67%) and



Other (64%). Only the majority of Householders (56%) selected 'Producers'. The majority of Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (82%), Local authority sector bodies (50%) and Trade bodies (67%) answered 'Other'.

Respondents who answered 'Other' were asked to explain their choice:

54 respondents answered 'Other' and left comments.

39 respondents do not support a levy. 30 respondents left an identical response, noting that businesses will not be able to absorb the charges resulting from the reforms, resulting in significantly reduced trade. A number of the respondents that do not approve of a levy suggest that neither producers nor consumers should pay for a levy, as funds from EPR and PPT will work to meet the aims of the legislation.

8 respondents suggested that both consumers and producers should pay for a levy.



4.0 Results beverage cups

Question 10. In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply single-use non-plastic cups? (Single choice)

The Impact Assessment (IA) - please refer to the consultation document - evaluates the impact of each policy option based on a series of models. A major assumption of the IA, is the availability of SUNP alternatives to SUP cups, especially the date at which they will become widely available. As the model is sensitive to the availability of these alternatives, this question was asked to gather key stakeholder perspectives on when the market may develop and supply SUNP cups and food containers.

2022:	6 responses (4%)
2023:	4 responses (3%)
2024:	1 response (1%)
2025:	1 response (1%)
2026+:	13 responses (9%)
Don't know:	18 responses (12%)
They already are available:	33 responses (22%)
The market would not develop and supply single-use non-plastic cups:	24 responses (16%)
Other:	48 responses (32%)
Not answered:	2 responses (1%)



Figure 8: In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply single-use non-plastic cups? (Single choice)

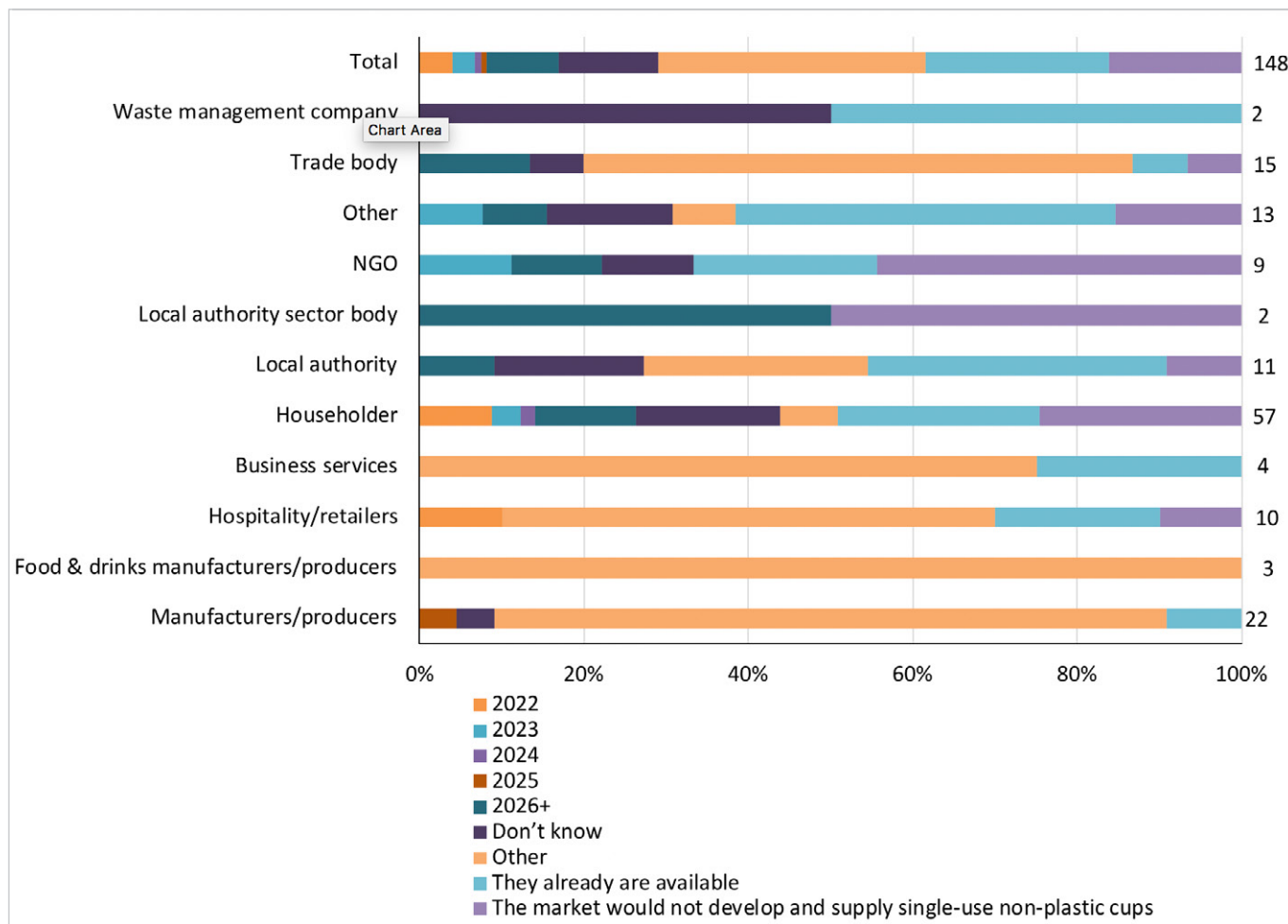


Figure 8 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). The response to this question across all respondent categories was mixed. In total, 32% of respondents answered 'Other' - detailed below. 22% of respondents selected 'They already are available' and 16% of respondents answered 'The market would not develop and supply single-use non-plastic cups'. The response rate for options with time-specific dates was low, the highest being '2026+' at 9% of respondents.

By respondent category, 'Other', made up the greatest proportion of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%), Business services (75%) and Trade bodies (67%). 'They already are available' made up the largest proportion of Local authorities (36%), the Other (43%) category type and Householders (25%). Another 25% of Householders answered 'The market would not develop and supply single-use non-plastic cups', alongside NGOs (44%) and Local Authority Sector Bodies (50%).



Respondents who answered ‘Other’ were asked to explain their choice:

48 respondents answered ‘Other’ and left a comment. Of these, no respondents gave a numeric date or timeframe in which the market might develop and supply single-use non-plastic cups. Largely, respondents used the free text box to share their perspectives on issues surrounding SUP alternatives on the market, these have been grouped below.

36 respondents commented under the theme of compliance and regulation. Several respondents brought up the Competition and Markets Authority’s (CMA) Green Claims Code, stating that, due to plastic lining, paper-based options already available do not comply with CMA.

34 respondents commented on the functionality of SUP alternatives. They state that SUP cup alternatives are already available, but lack functionality as equivalents e.g. cannot withstand hot temperatures, are not leakproof, greaseproof or recyclable.

23 respondents mention research and innovation of SUP alternatives. A number of Manufacturers/producers, Food & drinks manufacturers/producers, Hospitality/retailers, Business services and Trade Bodies state research, innovation and investment in SUP alternatives is currently taking place. However, note future EPR policy costs may negatively impact research and innovation capabilities of SUP alternatives. Stakeholders also raise concerns over the environmental impact of SUP alternatives and request impact and life cycle assessments (LCAs).

27 respondents commented on end of use. A number of respondents note that the proposed policy options do not target the issue of littering, waste in general and the over-consumption of single-use cups and food containers. Respondents also state that many alternatives are not currently recyclable and will require new, expensive recycling infrastructure. However, respondents state that future EPR policy will incentivise more recyclable packaging and recycling infrastructure.

17 respondents, largely from the wider business group and trade body stakeholder types, commented under theme of costs to consumers, stating that they do not want to burden consumers with additional costs of SUP alternatives.

Question 11. Respondents were asked to describe the SUP cup that is already available if they selected ‘They are already available’ to question 10:

33 respondents answered, ‘They are already available’, 32 left comments.

Home and industrial compostable cups were mentioned by 11 respondents - note, compostable cups are within the policy’s scope. Respondents noted that some compostable cups may not be legally compliant under the CMA and that the recycling of compostable cups is problematic due to limited collections infrastructure and industrial composting facilities, as well as cups being hard to differentiate against standard SUP cups for recycling.



Similar issues were observed in other SUNP cup materials respondents noted. These include paper/card, bamboo, edible, metal, ceramic, glass and aqueous lined cups. Paper/card was listed by 8 respondents, the other alternative materials listed were mentioned by 1 to 2 respondents each.

4.1 Ban

Question 12. If a ban were to be introduced on SUP beverage cups (including plastics or bioplastics) how should the ban be implemented? (*Single choice*)

If a ban on SUP beverage cups were introduced in NI, a date could be introduced outright to allow all affected parties time to prepare or be phased out gradually, over a period of time. This question was asked to gauge how respondents would prefer a ban to be implemented.

Fully implemented from the outset:	37 responses (25%)
Phased in over 6 months:	30 responses (20%)
Phased in over 1 year:	29 responses (19%)
Other:	50 responses (33%)
Not answered:	4 responses (3%)



Figure 9: If a ban were to be introduced on SUP beverage cups (including plastics or bioplastics) how should the ban be implemented? (Single choice)

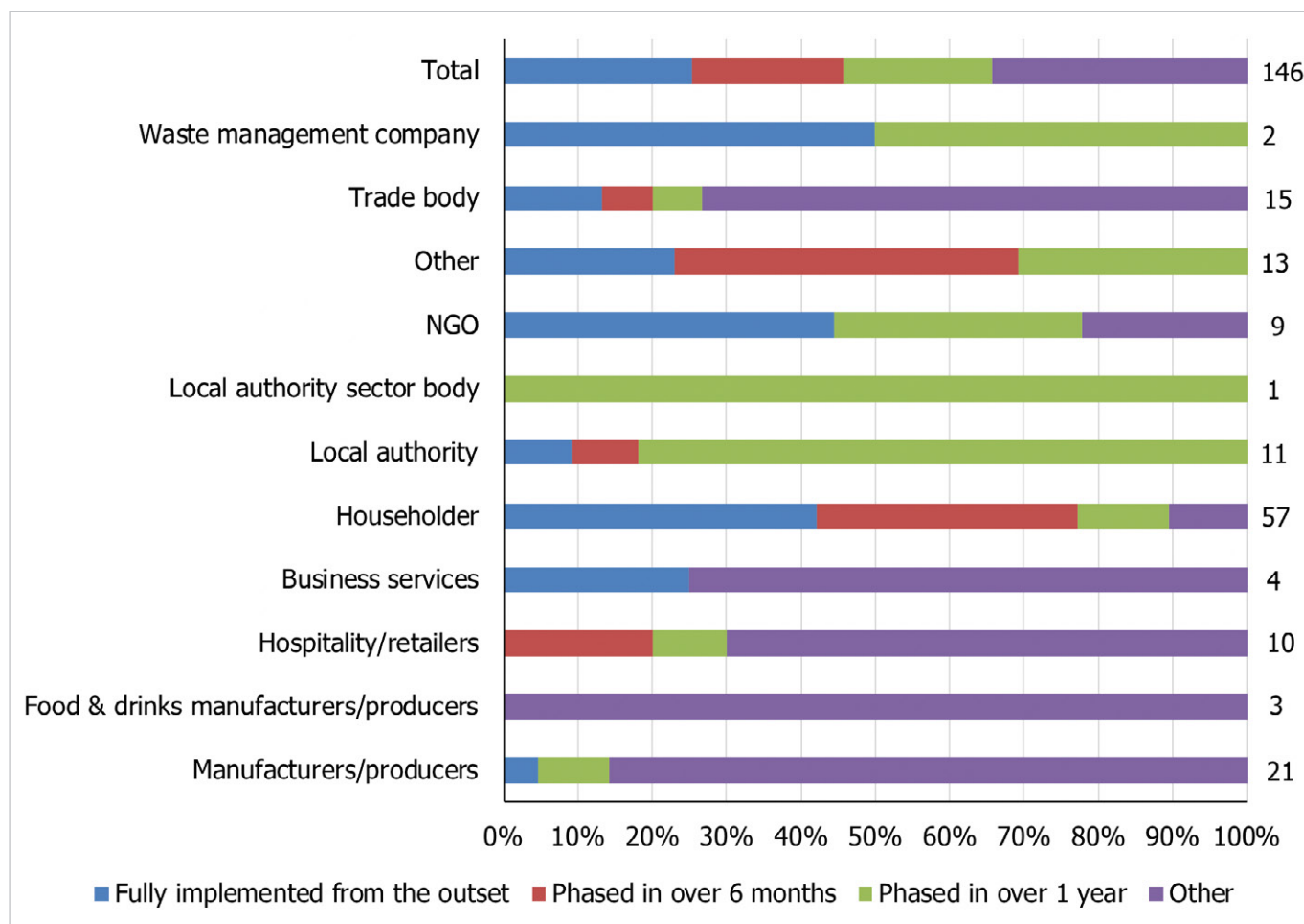


Figure 9 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). The response to this question across all respondents was mainly evenly split. Excluding 'Other' (33%) - detailed below, 'Fully implemented from the outset' was the marginally preferred roll out strategy, making up 25% of the total respondents. 'Phased in over 6 months' and 'Phased in over 1 year' total to 20% and 19% of all respondents respectively.

By respondent category, 'Other', made up the greatest proportion of the 4 business sub-groups, Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (64%), Business services (75%), as well as Trade bodies (73%). A ban 'Fully implemented from the outset' had the highest response rate from Householders (42%), NGOs (44%) and Waste management companies (50%). The remaining 50% of Waste management companies preferred a ban 'Phased in over 1 year', along with Local authority (82%) and Local authority sector body (50%) stakeholder groups.



Respondents who answered ‘Other’ were asked to explain their choice:

50 respondents answered ‘Other’ to question 11, and 49 left a comment.

Of these, 46 responses do not support a ban. A lack of evidence on the environmental impact of SUP alternatives, as well as the economic impacts of a ban on hospitality and retailers are given as the basis for this position.

5 respondents offered a timeframe in implementing the proposed ban. A phased approach in over 2 years was favoured by 3 respondents. An immediate ban and a ban phased in 3 months were both mentioned by 1 respondent.

Question 13. If a ban on were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a ban on SUP beverage cups be introduced? (Single choice)

This question was asked to garner what year various stakeholder groups would prefer a ban being introduced.

2022:	54 responses (36%)
2023:	27 responses (18%)
2024:	8 responses (5%)
2025:	1 response (1%)
2026+:	8 responses (5%)
Other:	45 responses (30%)
Not answered:	7 responses: 5%



Figure 10: If a ban on were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a ban on SUP beverage cups be introduced? (Single choice)

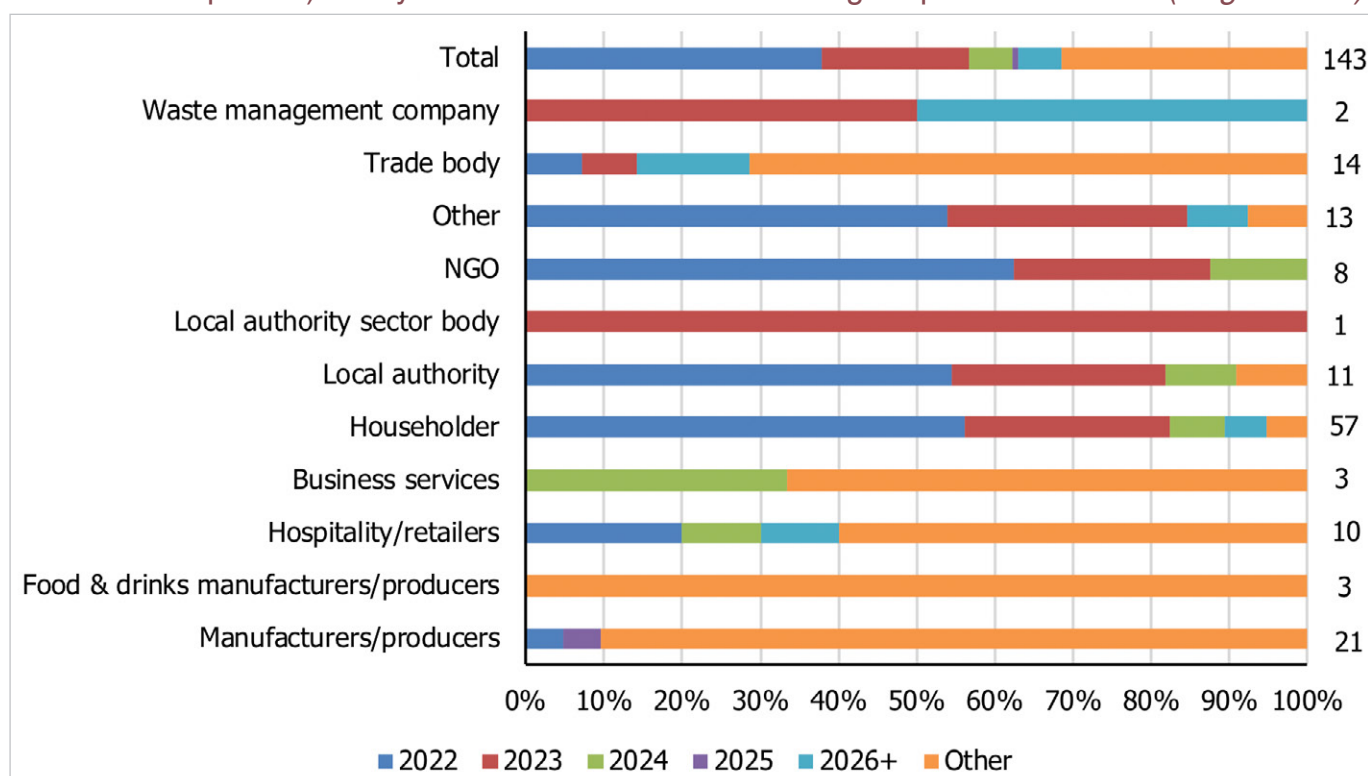


Figure 10 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). There are mixed responses for what year a ban on SUP beverage cups should be introduced. The highest percentage across all respondents (36%) was seen for the year '2022', followed by 'Other' - detailed below, answered by 30% of respondents. Response rates were lower for succeeding years, particularly '2024', '2025' and '2026+'.

By respondent category, the majority of Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%), Business services (50%) and Trade bodies (67%) answered 'Other'. For Householders (56%), Local authorities (55%), NGOs (56%) and the Other (50%) category type, '2022' had the highest response rate, followed by '2023'.

Respondents who answered 'Other' were asked to explain their choice:

45 respondents answered 'Other', 44 left a comment.

No respondents provided a time specific date in which a ban should be introduced.

40 respondents do not support a ban outright. The majority of comments were near identical responses. Respondents state that re-useable systems have been shown to have a greater environmental impact than single-use, as well as the economic impacts of a ban on hospitality and retailers as the basis for their position.

Future EPR policy was also a common theme, mentioned by 5 respondents. Of these, some respondents state a ban would need to align with EPR, whilst other respondents view EPR as an effective intervention to SUPs, frequently citing the proposed mandatory take-back scheme.



4.2 Levy

Question 14. If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a levy on SUP beverage cups (of any scope) be introduced? *(Single choice)*

A levy would be introduced from a set date to be determined. From that date forwards, the levy would apply. This question was asked to gauge stakeholders views on a preferred start date.

2022:	65 responses (43%)
2023:	23 responses (15%)
2024:	2 responses (1%)
2025:	2 responses (1%)
2026+:	5 responses (3%)
Other:	47 responses (31%)
Not answered:	6 responses (4%)

Figure 11: If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a levy on SUP beverage cups (of any scope) be introduced? *(Single choice)*

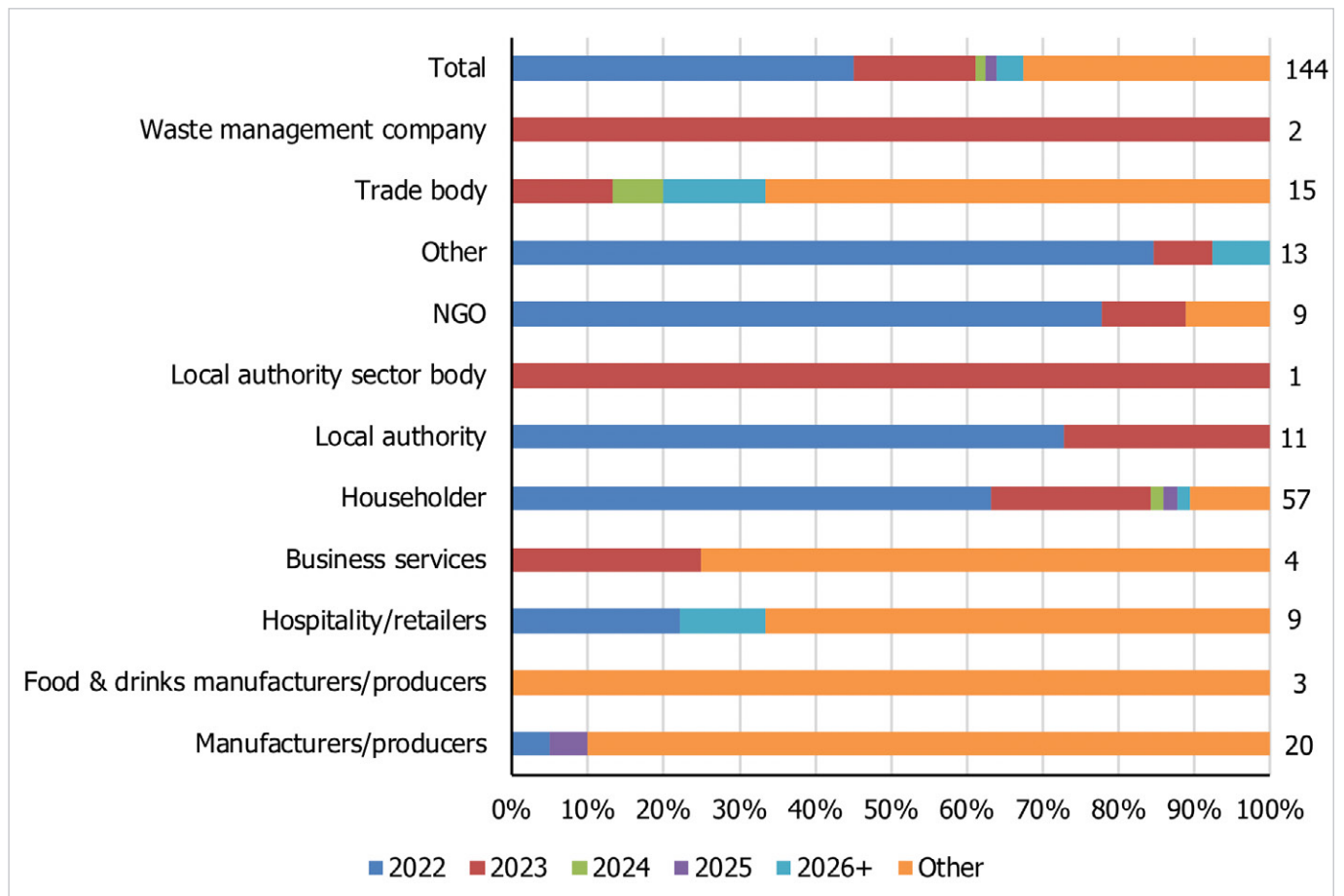




Figure 11 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes ‘Not Answered’). Overall, respondents favoured an earlier introduction of a levy, with 43% respondents answering year ‘2022’, and 15% of respondents answering year ‘2023’. ‘Other’ - detailed below, makes up 31% of responses. Years ‘2024’, ‘2025’ and ‘2026+’ all received comparably low response rates.

There is variation in response by respondent category. ‘Other’ makes up the highest percentage of responses across Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%), Business services (75%) and Trade bodies (67%). The year ‘2022’ is preferred amongst Householders (63%), Local authorities (73%), NGOs (78%) and the category type Other (79%). Of the Hospitality/retailers, Business services and Trade bodies that did not select ‘Other’, the year ‘2022’ and ‘2023’ were favoured. ‘2023’ also featured high response rates from Local authority sector bodies (50%) and Waste management companies (100%).

Respondents who answered ‘Other’ were asked to explain their choice:

47 respondents answered ‘Other’, 46 left comments.

No respondents provided a time specific date in which a levy should be introduced.

36 respondents do not support a levy. Of these, 29 respondents left an identical response, reasons for their position include the economic impact to householders, government and businesses in the implementation a levy, health and safety concerns of multi-use alternatives and the environmental impact of SUP alternatives.

Of the 10 respondents that do not openly oppose a levy, stakeholders suggest that a levy should be introduced as soon as reasonably practicable, with careful consideration of EPR and DRS policies coming into place in 2023/2024, alongside national communications to strengthen citizen engagement and behaviour change.

Question 15. If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what level should it be set at? (Single choice)

The Impact Assessment work undertaken for this consultation suggested the levy charge be set at 25p per SUP beverage cup. This question was designed to assess what the preferred level of the levy was and how this differed from the modelled value.

£0.10 - £0.24:	19 responses (13%)
£0.25 - £0.49:	42 responses (28%)
£0.50 - £0.74:	13 responses (9%)
£0.75 - £1.00:	20 responses (13%)
Other:	51 responses (34%)
Not answered:	5 responses (3%)



Figure 12: If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what level should it be set at? (Single choice)

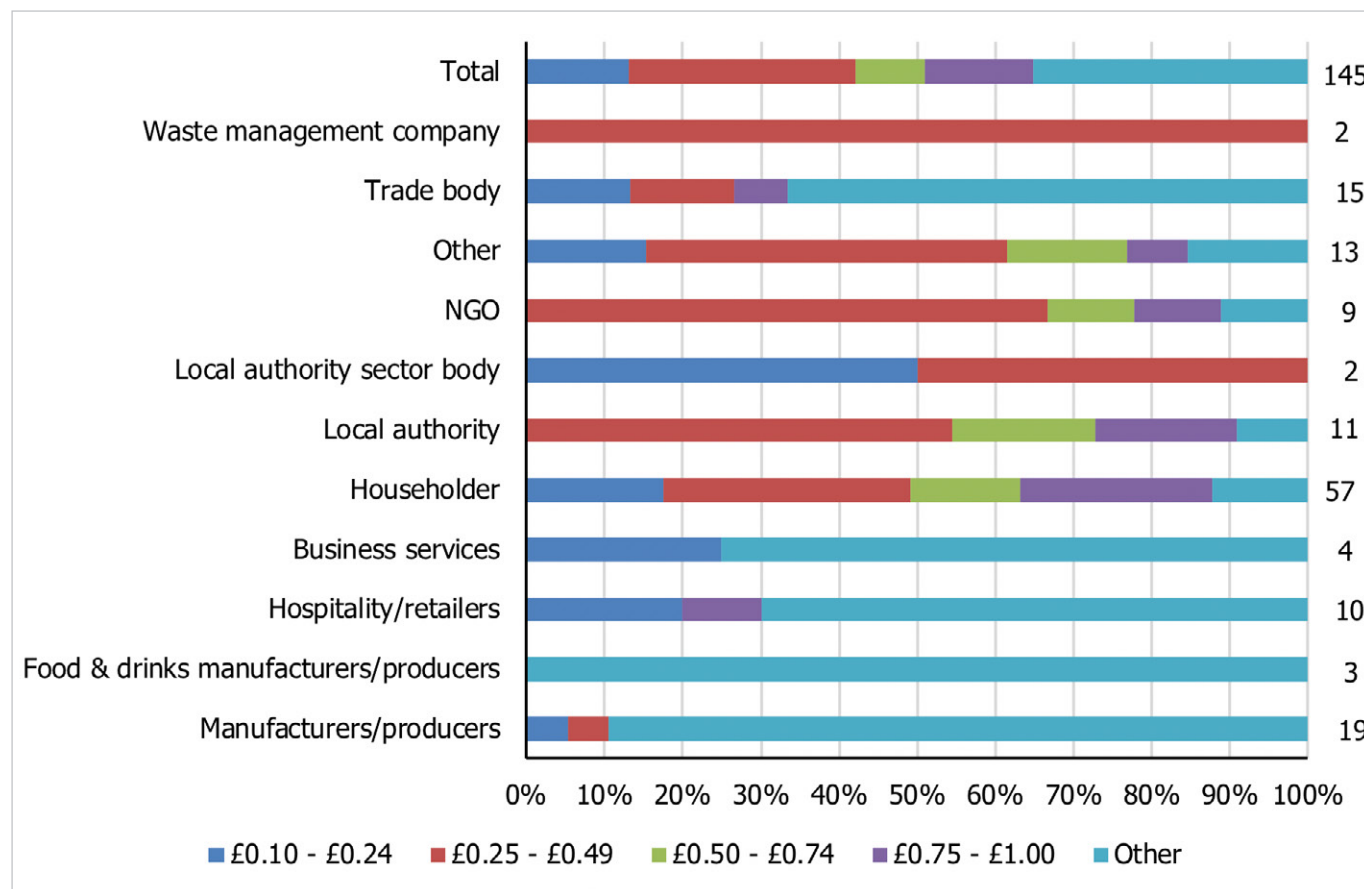


Figure 12 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Overall, responses to this question are mixed. The greatest proportion of responses (34%) answered 'Other' - detailed below. Of the respondents who selected a specific levy fee, the charge of '£0.25 - £0.49' had the highest response rate, making up 28% of overall responses. The lowest and highest charges listed, '£0.10 - £0.24' and '£0.75 - £1.00' respectively, both made up 13% of the total responses.

There is some variation in response by respondent category. The highest response rate for Manufacturers/producers (77%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (64%), Business services (75%) and Trade bodies (67%) was 'Other'. When Manufacturers/producers, Hospitality/retailers and Business services selected a specific levy fee, the £0.10 - £0.24 charged was preferred. A '£0.25 - £0.49' cup charge was favoured amongst Local authorities (55%), Local authority sector bodies (50%), NGOs (67%), Other (43%), Waste management companies (100%) and Householders (32%). Though, Householders were fairly evenly split across each fee category listed.



Respondents who answered 'Other' were asked to explain their choice:

51 respondents answered 'Other', 50 left a comment.

37 respondents do not support a levy. Reasons given include the economic impact to householders, government and businesses in the implementation a levy. Particularly combined with the additional economic costs and policy unknowns to manufacturers and producers of future policies, namely the PPT, DRS and EPR.

Of the 13 respondents that do not explicitly oppose a levy, stakeholders generally agree that a low levy should be introduced first with the option to increase over time upon review. Similar to those who do support a levy, policy unknowns and economic costs of PPT, DRS and EPR policies were raised as factors clouding a clear position.

4.3 Voluntary scheme

Question 16. Do you believe a voluntary scheme for SUP beverage cups, of any form, would be effective in meeting the goal of a significant reduction in SUP cup use? (Single choice)

A voluntary retailer-led scheme could be initiated and set up by the retail sector to reduce the usage of SUP beverage cups. Organisations may choose to work together as part of a joint initiative or follow diverse plans. This question was asked to gauge whether stakeholders view a voluntary scheme as effective in meeting the legislations aims.

Yes:	73 responses (49%)
No:	75 responses (50%)
Not answered:	2 responses (1%)



Figure 13: Do you believe a voluntary scheme for SUP beverage cups, of any form, would be effective in meeting the goal of a significant reduction in SUP cup use? (Single choice)

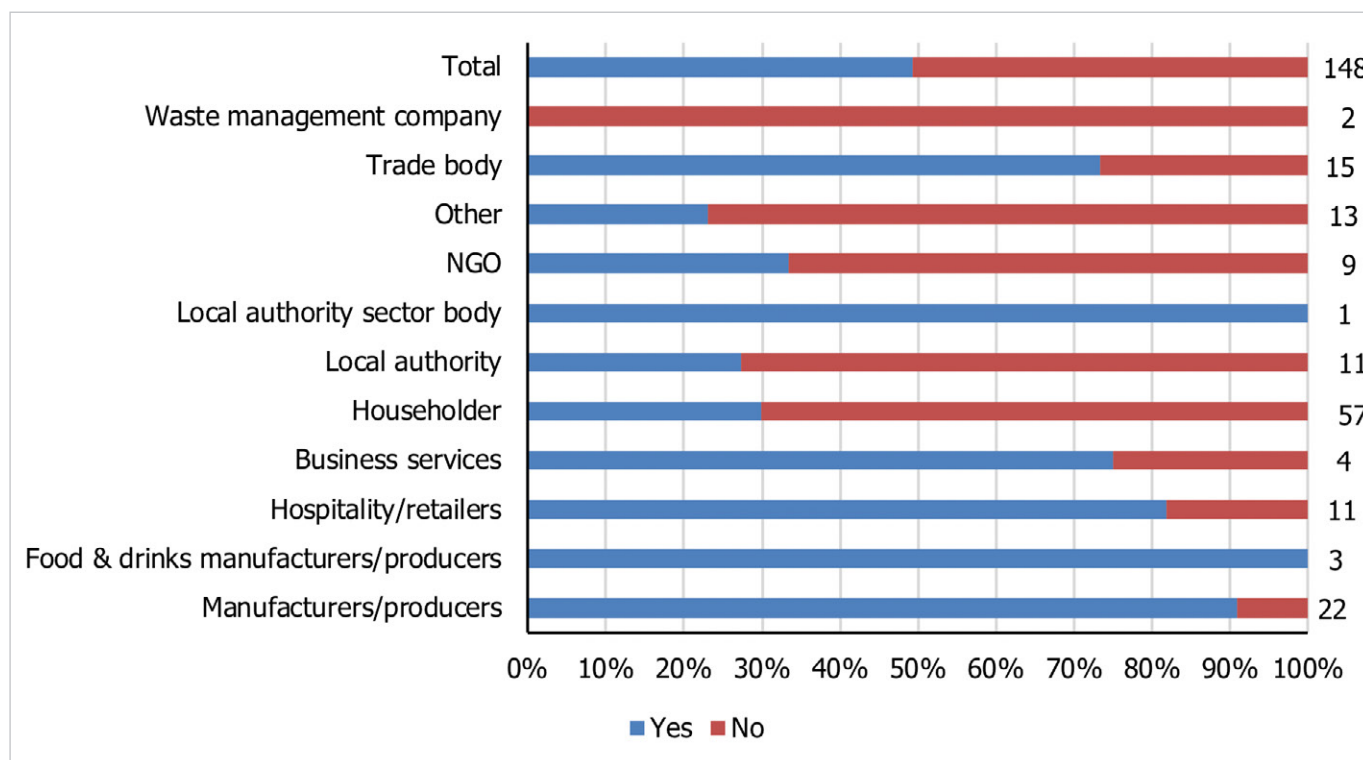


Figure 13 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Overall, responses to this question are near equally divided. 49% of respondents answered 'Yes', believing a voluntary scheme for SUP cups would be effective in meeting the policies aims, 50% of respondents answered 'No'.

By respondent category, 'Yes' featured as the highest response rate for Manufacturers/producers (91%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (82%), Business services (75%), Local authority sector bodies (50%) and Trade bodies (73%). A greater proportion of Householders (70%), Local authorities (73%), NGOs (67%), Other (71%) and Waste management companies (100%) answered 'No' to question 16.

Respondents were asked to explain what design of voluntary scheme would be successful in terms of administration, monitoring, and applications:

76 respondents answered and left a comment.

Take-back schemes were a key theme, mentioned by 66 respondents. 33 respondents, made up of mostly Manufacturers/producers, Food & drinks manufacturers/producers and Trade bodies, suggested the inclusion of a voluntary take-back scheme, similar to the National Cup Recycling Scheme, stating that voluntary take-back can increase capture rates, collection points and the segregation of materials. 34 respondents, made up of mostly Manufacturers/producers and Trade bodies, state that the inclusion of a mandatory take-back scheme can increase capture rates, collection points and the segregation of materials. Respondents positively note that the proposed mandatory take-back scheme under EPR can significantly improve recycling.



Amongst mostly Local authorities, 9 respondents commented under the theme of behaviour change. Respondents would like the policy proposals to promote positive behavioural change to prevent SUP consumption and reduce littering via campaigns, national communications and education.

7 respondents commented under the theme disincentives, suggesting that a voluntary scheme should include disincentives for SUPS e.g., charges on consumers and/or producers.

5 respondents, from mixed stakeholder groups, commented under the theme incentives, suggesting that a voluntary scheme should include disincentives incentives for re-use/SUNPs on consumers e.g., discount, reward, refund, DRS.

Re-use was mentioned by 5 respondents from a range of stakeholder groups. Respondents state that reliable and effective re-use requires provision of wash facilities across beverage and food services industry. Respondents also raise health and safety concerns arising from increased re-use.

Question 17. What are the key elements for a successful voluntary scheme for SUP beverage cups? (Multiple-choice)

This question was asked to find out what elements of a voluntary scheme stakeholders view as key in reducing the consumption of SUP cups.

The ability to in some way enforce signatories to enact the agreement:	72 responses (58%)
For either internal or external monitoring to be conducted:	71 responses (57%)
For a significant amount of the affected organisations (by sales volume) to be signed up:	68 responses (55%)
A consumer facing communications campaign explaining the purpose and aims of the agreement:	77 responses (62%)
For the agreement to contain agreed action for all signatories to undertake:	73 responses (59%)
For signatories to the agreement to have flexibility in achieving the aims of the agreement:	35 responses (28%)
Other:	33 responses (27%)
Not answered:	26 responses (17%)



Figure 14: What are the key elements for a successful voluntary scheme for SUP beverage cups? (Multiple-choice)

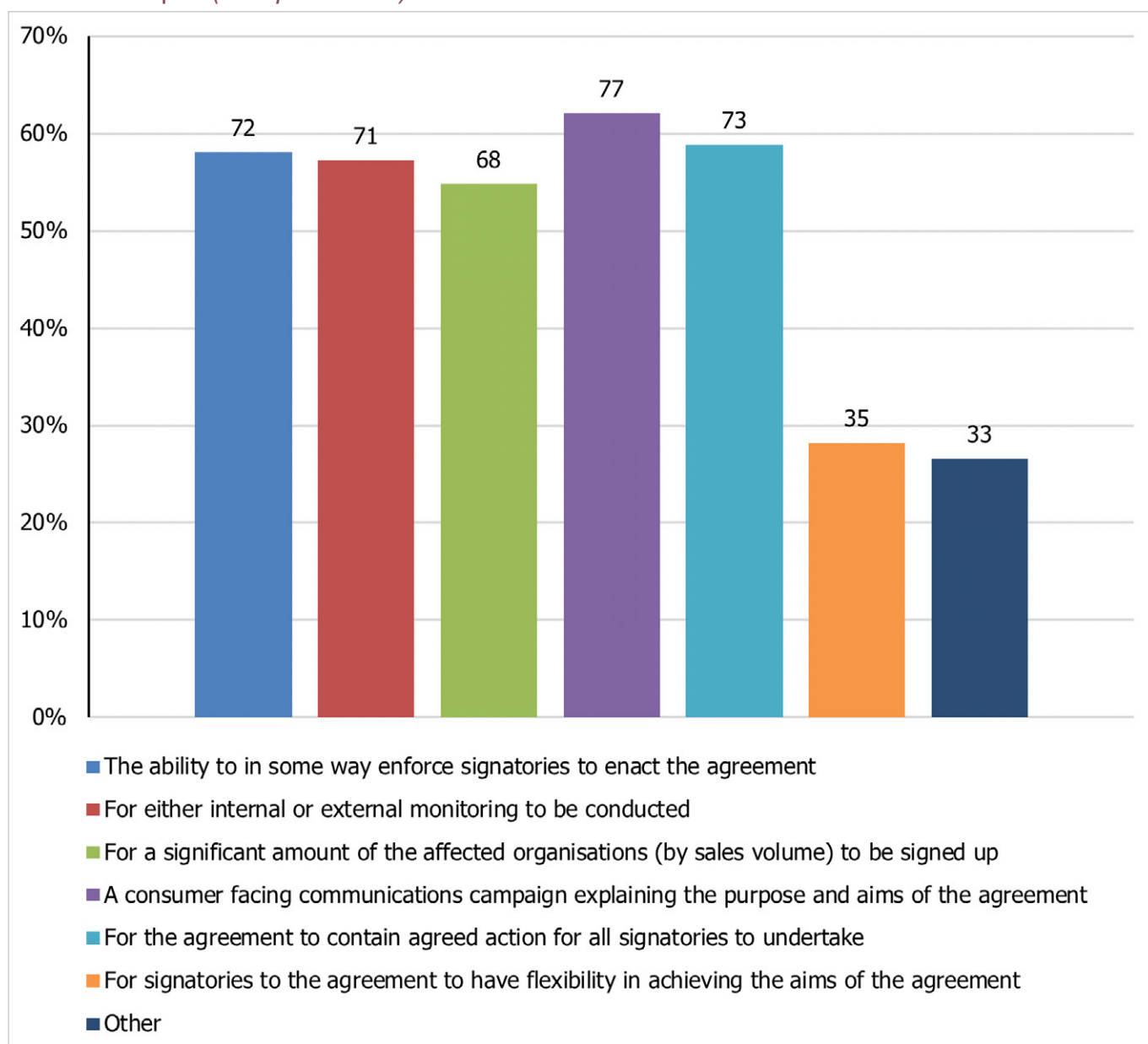


Figure 14 shows the total number of respondents selecting elements they thought are key for a successful voluntary scheme for SUP beverage cups and is based only on those who answered (i.e. excludes 'Not Answered'). Across all respondents, 5 options received high response rates. 62% of responses agreed that 'A consumer facing communications campaign explaining the purpose and aims of the agreement' is a key element. 'For the agreement to contain agreed action for all signatories to undertake' was backed by 59% of respondents. 58% of respondents agreed that a voluntary agreement should have 'The ability to in some way enforce signatories to enact the agreement'. 57% of respondents answered, 'For either internal or external monitoring to be conducted' and 55% of respondents 'For a significant amount of the affected organisations (by sales volume) to be signed up'. 'For signatories to the agreement to have flexibility in achieving the aims of the agreement' had the lowest response rate bar 'Other' - detailed below, making up 28% of responses.



Table 4 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). Highest response rates for 'The ability to in some way enforce signatories to enact the agreement' were amongst Manufacturers/producers (68%), Householders (63%), Local authority sector bodies (100%), NGOs (86%), Other (70%) and Waste management companies (100%). Including Local authorities, the same category types formerly listed gave high response rates 'For either internal or external monitoring to be conducted'. 'For a significant amount of the affected organisations (by sales volume) to be signed up', Hospitality/retailers (60%), Householders (63%), Local authorities (63%), Local authority sector bodies (100%) NGOs (71%), Other (80%) and Waste management company (100%) category types gave a high number of responses. For both 'A consumer facing communications campaign explaining the purpose and aims of the agreement' and 'For the agreement to contain agreed action for all signatories to undertake', Manufacturers/producers, Local authorities, Local authority sector bodies, NGOs, Other, Trade bodies and Waste management company gave a high number of responses. Only Local authority sector bodies (100%) and NGOs (57%) offered high response rates 'For signatories to the agreement to have flexibility in achieving the aims of the agreement'. Low response rates were consistently found amongst Food & drinks manufacturers/producers and Business services for all of the voluntary scheme elements listed, except 'Other'.

Respondents who answered 'Other' were asked to explain their choice:

33 respondents answered 'Other' and left a comment.

11 respondents supported a mandatory take-back scheme for SUP beverage cups and note that a mandatory take-back scheme is included in EPR proposals.

4 respondents do not support a voluntary scheme.

No other key themes were found. Though, successful management of voluntary schemes were highlighted as an important factor for success, as well as national-wide targets and improved recycling infrastructure for SUP alternatives.



Table 4: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	The ability to in some way enforce signatories to enact the agreement	For either internal or external monitoring to be conducted	For a significant amount of the affected organisations (by sales volume) to be signed up	A consumer facing communications campaign explaining the purpose and aims of the agreement	For the agreement to contain agreed action for all signatories to undertake	For signatories to the agreement to have flexibility in achieving the aims of the agreement	Other	Not Answered	Total answered
Manufacturers/ producers	68%	68%	23%	73%	73%	27%	23%	0%	22
Food & drinks manufacturers/ producers	33%	33%	33%	33%	33%	0%	67%	0%	3
Hospitality/ retailers	20%	30%	60%	50%	40%	20%	50%	1%	10
Business services	33%	33%	33%	33%	33%	33%	100%	1%	3
Householder	63%	52%	63%	50%	46%	24%	17%	7%	46
Local authority	50%	63%	63%	75%	63%	50%	13%	2%	8
Local authority sector body	100%	100%	100%	100%	100%	100%	0%	1%	1
NGO	86%	71%	71%	100%	100%	57%	43%	1%	7
Other	70%	100%	80%	90%	90%	40%	0%	3%	10
Trade body	38%	38%	46%	54%	54%	15%	46%	1%	13
Waste management company	100%	100%	100%	100%	100%	0%	0%	1%	1



5.0 Results food containers

Question 18. In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply SUNP (including plastic lining) food containers? (Single choice)

The Impact Assessment (IA) - please refer to the consultation document - evaluates the impact of each policy option based on a series of models. A major assumption of the IA, is the availability of SUNP alternatives to SUP cups, especially the date at which they will become widely available. As the model is sensitive to the availability of these alternatives, this question was asked to gather key stakeholder perspectives on when the market may develop and supply SUNP cups and food containers.

2022:	6 responses (4%)
2023:	6 responses (4%)
2024:	1 response (1%)
2025:	2 responses (2%)
2026+:	11 responses (7%)
Don't know:	13 responses (9%)
Other:	40 responses (27%)
They are already available:	40 responses (27%)
The market would not develop and supply SUNP food containers:	24 responses (16%)
Not answered:	7 responses (5%)



Figure 15: In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply SUNP (including plastic lining) food containers? (Single choice)

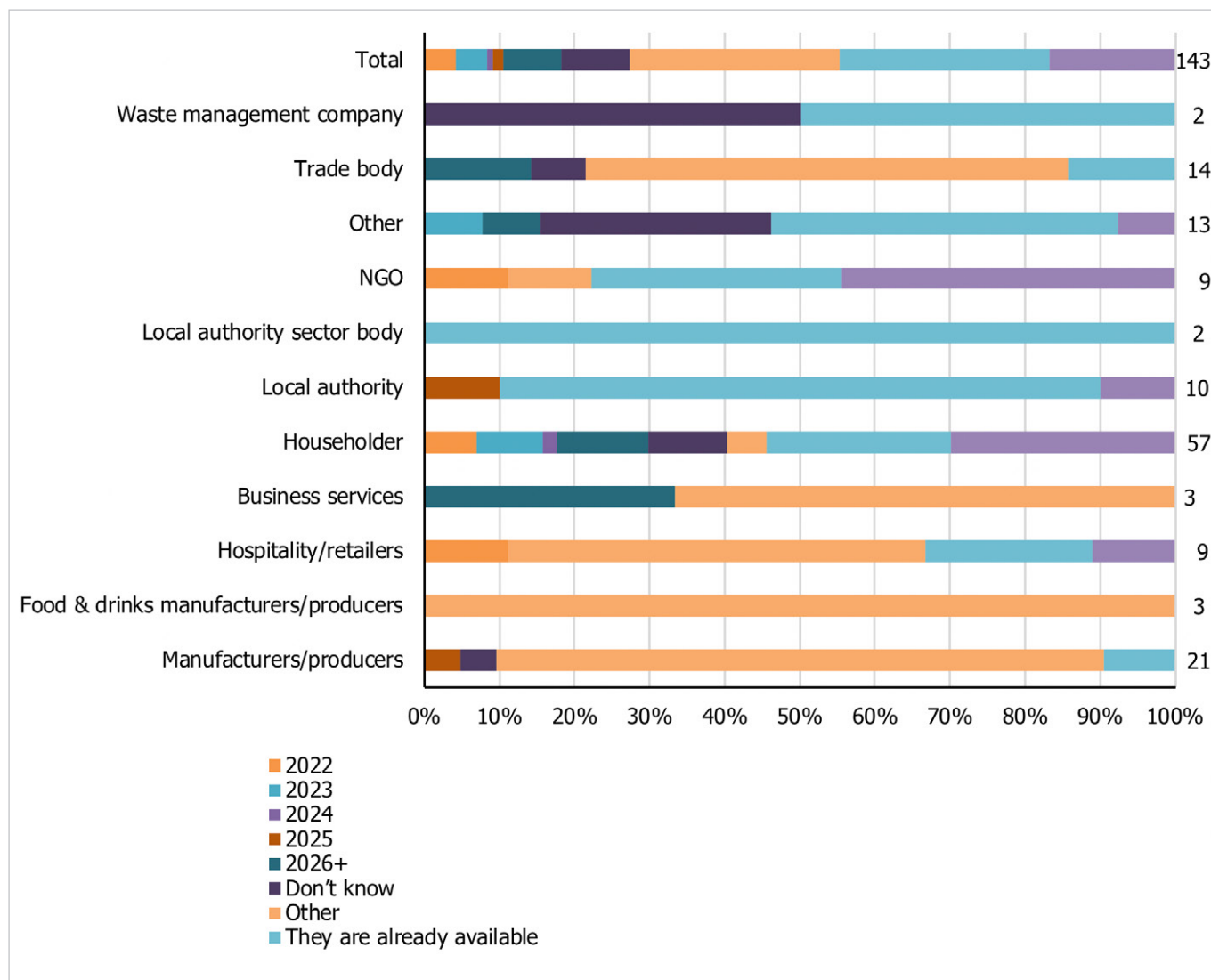


Figure 15 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Overall, there is variation in response. Both 'Other' - detailed below, and 'They are already available' received the highest response, answered by 27% of all respondents. This is followed by 'The market would not develop and supply SUNP food containers', receiving 16% of total responses. The time specific options, '2022', '2023', '2024', '2025' and '2026+' plus 'Don't know' make up a low percentage of overall responses.

Respondents who answered 'Other' were asked to explain their choice:

40 respondents answered 'Other' and left a comment.

No responses gave a numeric date or timeframe in which the market might develop and supply single-use food containers. Largely, a number of respondents used the free text box to share their perspectives on issues surrounding SUP alternatives on the market. These have been grouped below.



Research and innovation were common themes mentioned by 31 respondents. In an identical response, respondents stated that innovation and investment in SUP alternatives are currently taking place, though future EPR policy costs may negatively impact research and innovation capabilities. Stakeholders also raised concerns over the environmental impact of SUP alternatives and requested IAs and LCAs.

30 respondents commented under the theme of compliance and regulation. Respondents note that the packaging sector are committed to finding SUP solutions that can be certified, noting compliancy issues surrounding compostable and biodegradable packaging. Respondents also highlight that the costs of innovation are impacted by changing legislation and the associated administrative compliance requirements.

29 respondents commented under the theme of functionality. Respondents state that SUP container alternatives are already available, however are not functional equivalents e.g., Not microwavable, leak. Respondents also state that alternatives do not meet health and safety regulations on food contact and highlight concerns over hygiene of reusable options.

End of use was another major theme, mentioned by 28 respondents. A number of respondents argue that the proposed policy options do not target the issue of littering, waste in general and the over consumption of single-use cups and food containers. Respondents also noted that many alternatives are not currently recyclable and will require new, expensive recycling infrastructure. Though, future EPR policy was highlighted as a policy to incentivise more recyclable packaging and recycling infrastructure.

Question 19. Respondents who answered 'They are already available' were asked to explain their choice and asked to describe the SUNP food container that is already available:

40 respondents answered, 'They are already available', 36 respondents left comments.

19 respondents mentioned compostable SUNPs - note, compostable cups and food containers are within the policy's scope. These included both home and industrial composting food containers. Respondents note that some compostable food containers may not be legally compliant under the CMA and that the recycling of compostable containers is problematic due to limited collections infrastructure and industrial composting facilities, as well as the food containers being hard to differentiate against standard SUP containers for recycling.

Paper/card were mentioned by 15 respondents.

Metals, such as aluminium, were mentioned by 7 respondents.

Other materials with lower responses include bamboo, edible, bioplastics, ceramics and glass.

Issues surrounding compliancy, collections and recycling infrastructure were also raised in the SUNP container materials listed above.



Question 20. What types of food containers should be targeted by the proposed measures? (Multiple-choice)

Currently, only Scope 1 food containers are within the ambit of the proposed policies. This question was asked to find out which food container types stakeholders think the proposed policy measures should target, with regards to the current legislation and potential future measures.

Takeaway food containers (food containers provided with meals purchased to take of the premises):	93 responses (65%)
Pre-filled food containers:	80 responses (56%)
Self-fill food containers (food containers that the customers fill themselves before purchase e.g. at a salad bar):	88 responses (62%)
Other:	48 responses (34%)
Not answered:	8 responses (5%)



Figure 16: What types of food containers should be targeted by the proposed measures? (Multiple-choice)

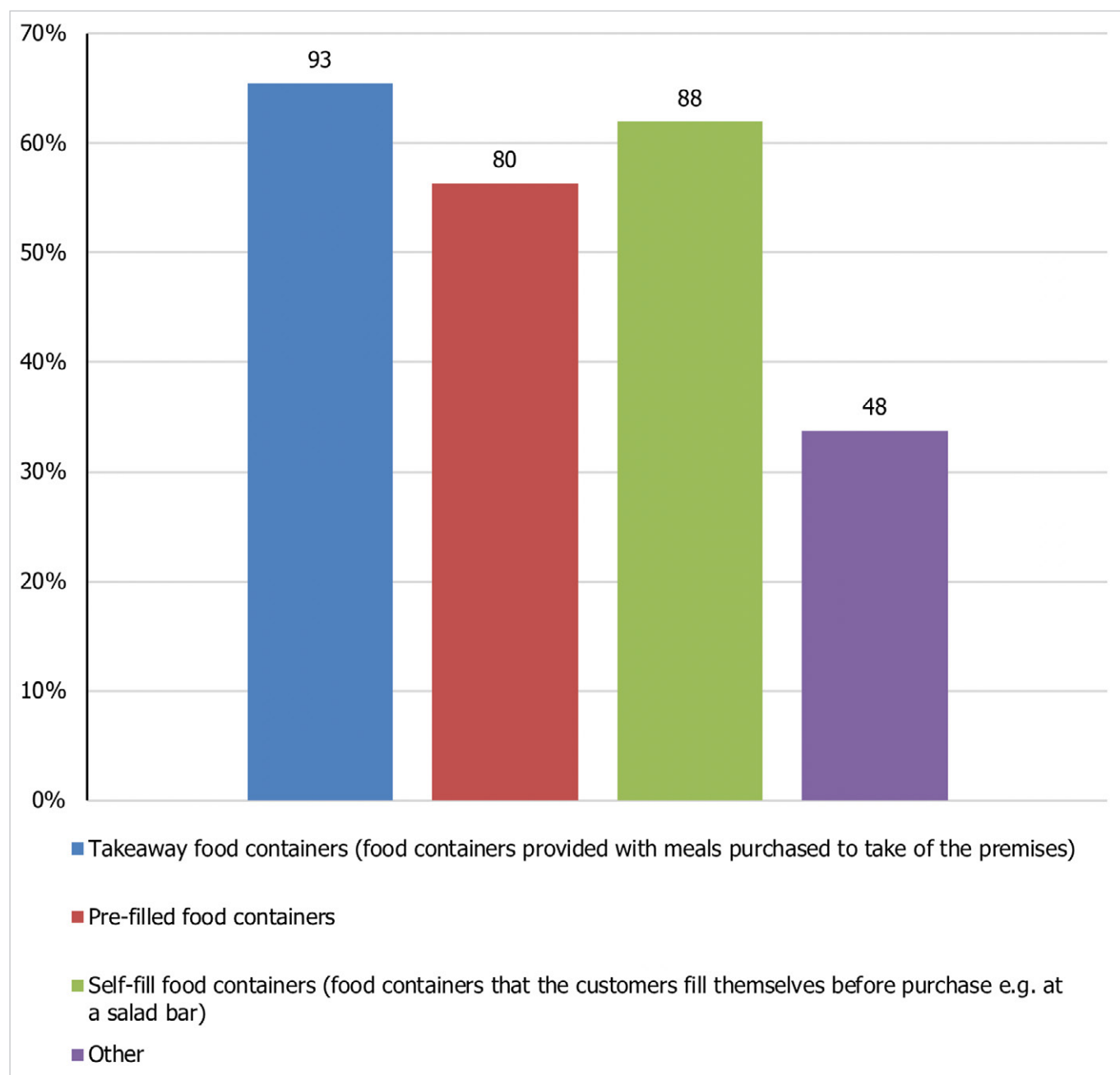


Figure 16 shows the total number of respondents selecting the types of food containers they thought should be targeted by the proposed measures and is based only on those who answered (i.e. excludes 'Not Answered'). Each food container addressed in the question received high response rates amongst all respondents. 65% of respondents selected 'Takeaway food containers', 62% of respondents selected 'Self-fill food containers' and 'Pre-filled food containers' was answered by 56% of respondents. 'Other' - detailed below received the lowest response rate at 34%.



Table 5 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes ‘Not answered’). There is significant variation in response by respondent category. The greatest response rates for the inclusion of ‘Takeaway food containers’ were amongst Householders, (87%), Local authorities (100%), Local authority sector bodies (100%), NGOs (100%), Other (100%) and Waste management companies (100%). The same category types, apart from Waste management companies, also responded at a high rate to ‘Pre-filled food containers’ and ‘Self-fill food containers’. Manufacturers/producers, Food & drinks manufacturers/producers, Hospitality/retailers and Trade bodies offered comparatively low response rates for the inclusion of featured container types, with the majority of responses opting for ‘Other’.

Table 5: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	Takeaway food containers	Pre-filled food containers	Self-fill food containers	Other	Not answered	Total answered (count)
Manufacturers/producers	10%	10%	10%	90%	9%	20
Food & drinks manufacturers/producers	0%	0%	0%	100%	0%	3
Hospitality/retailers	18%	18%	27%	73%	0%	11
Business services	33%	33%	33%	33%	25%	3
Householder	87%	82%	82%	11%	4%	55
Local authority	100%	82%	91%	0%	0%	11
Local authority sector body	100%	50%	50%	50%	0%	2
NGO	100%	100%	100%	11%	0%	9
Other	100%	67%	100%	0%	14%	12
Trade body	29%	21%	29%	71%	7%	14
Waste management company	100%	0%	50%	0%	0%	2

Respondents who answered ‘Other’ were asked to explain their choice:

48 respondents answered ‘Other’ and left a comment.

Of these, 36 respondents stated that none of the container types should be targeted in the proposed policy measures. Reasons for this position include health and safety concerns of re-



usable containers at retailer premises, with liability and implications of illness caused from re-useable containers likely to fall on retailers. Respondents also noted that the complexities of the proposal policy measures is likely to cause confusion where containers in scope of a ban or levy are used in the same premises as those which are exempt. Some respondents also note that the proposed policies would be expected to negatively impact smaller businesses. Respondents note that costs and logistics related to the proposed policies would be expected to slow service and reduce trade.

Of the responses that suggested food container types to be targeted by the proposed measures, 4 respondents stated all SUP packaging. Non-recyclable containers and aluminium foil containers were both mentioned by 1 respondent.

5.1 Ban

Question 21. If a ban on SUP food containers were introduced how should the ban be implemented? (*Single choice*)

If a ban on SUP food containers were introduced in NI, a date could be introduced outright to allow all affected parties time to prepare or be phased out gradually, over a period of time. This question was asked to gauge how respondents would prefer a ban to be implemented.

Fully implemented from the outset:	35 responses (23%)
Phased in over 6 months:	29 responses (19%)
Phased in over 1 year:	30 responses (20%)
Other:	49 responses (33)
Not answered:	7 responses (5%)



Figure 17: If a ban on SUP food containers were introduced how should the ban be implemented? (Single choice)

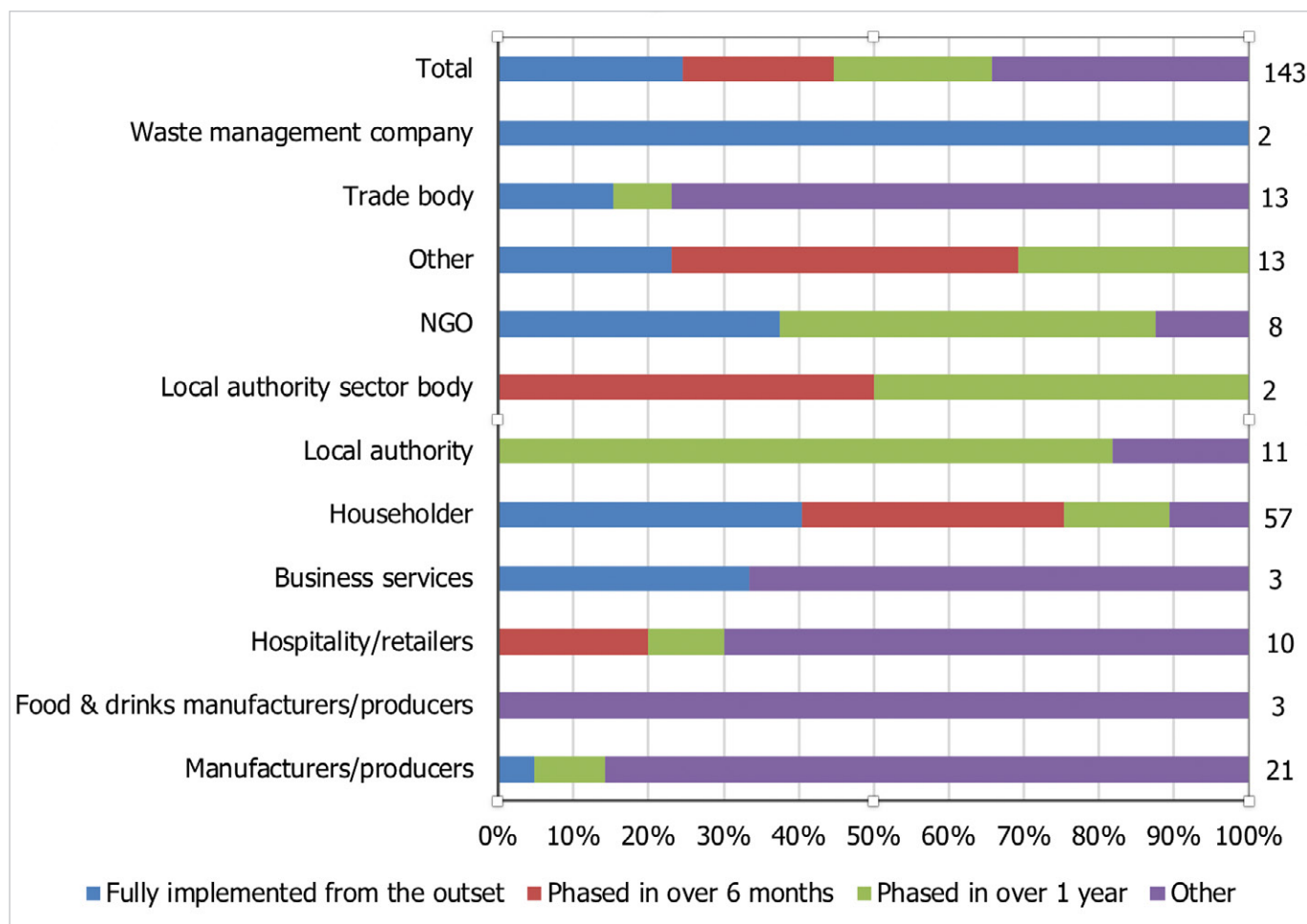


Figure 17 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). The response to this question across all respondents was mixed. Excluding 'Other' (33%) - detailed below, 'Fully implemented from the outset' was the preferred roll out strategy, making up 23% of the total respondents. 'Phased in over 6 months' and 'Phased in over 1 year' total to 20% and 19% of all respondents respectively.

By respondent category, the majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (64%), Business services (50%) and Trade bodies (67%) selected 'Other'. A ban 'Fully implemented from the outset' received the highest response rate from Householders (40%) and Waste management companies (100%). The greatest percentage of the Other (43%) category type favoured a ban 'Phased in over 6 months', whilst NGOs (44%) favoured a ban 'Phased in over 1 year'. Local authority sector bodies were split between 'Phased in over 6 months' and a ban 'Phased in over 1 year'.

Respondents who answered 'Other' were asked to explain their choice:

49 respondents answered 'Other' and left a comment.



40 respondents do not support a ban. Common reasons include the environmental impact and health and safety concerns of SUP alternatives, as well as the perceived economic burden of a ban on hospitality and retailers. Note, 15 respondents that do not support a ban, stated that a ban phased in over 2 years would be the most favourable option if a ban were implemented.

5 respondents also favoured a phased approach in over 2 years. Respondents commented that this would allow businesses to adapt to a ban and finish SUP stock.

Question 22. Is there an alternative method of introducing the ban, not mentioned in this consultation? (Single choice)

A ban could be introduced in several ways. This question was asked to see whether stakeholders are aware of, or have preferences, towards alternative methods not listed in the consultation.

Yes:	17 responses (11%)
No:	94 responses (63%)
Not answered	: 39 responses (26%)

Figure 18: Is there an alternative method of introducing the ban, not mentioned in this consultation? (Single choice)

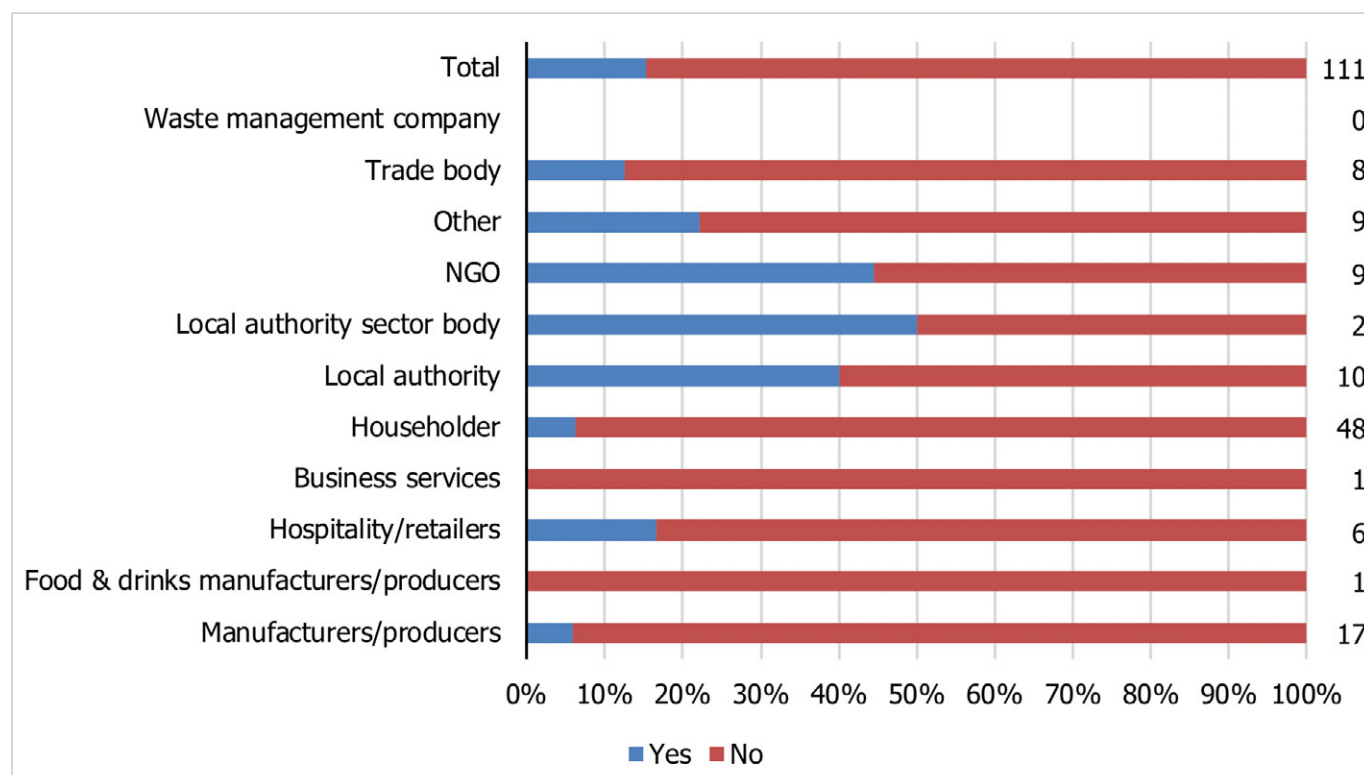


Figure 18 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Overall, respondents overwhelmingly answered 'No' to the question, with 63% of the response rate. 'Yes' received 11% of the overall response rate - detailed below.



Respondents who answered ‘Yes’ were asked to explain their choice:

17 respondents answered ‘Yes’ to question 22, and 16 left a comment.

Phased approaches were a common theme found. A voluntary scheme, succeeded by a levy, then a ban was mentioned by 4 respondents. A levy, succeeded by a ban was mentioned by 2 respondents.

2 respondents suggested that the introduction of a re-use platform service for food containers could be implemented alongside any of the policies proposed.

Question 23. In what year should a ban on SUP food containers be introduced? (Matrix)

Question 23 was a closed-ended matrix question. The container types are in the left hand column and the dates follow - see **Figure 19**. Respondents were asked to select one date for each container type. The results below have been split by container type.

Figure 19: Matrix as displayed in the consultation

In what year should a ban on SUP food containers be introduced? (select 1 option for each row, put cross in selected box)						
Takeaway food containers	2022	2023	2024	2025	2026	Later
Pre-filled food containers	2022	2023	2024	2025	2026	Later
Self-fill food containers	2022	2023	2024	2025	2026	Later

5.1.1 Takeaway food containers

2022:	53 responses (35%)
2023:	28 responses (19%)
2024:	8 responses (5%)
2025:	5 responses (3%)
2026:	2 responses (1%)
Later:	6 responses (4%)
Not answered:	48 responses (32%)



Figure 20: In what year should a ban on SUP food containers be introduced? Takeaway food containers (Single choice)

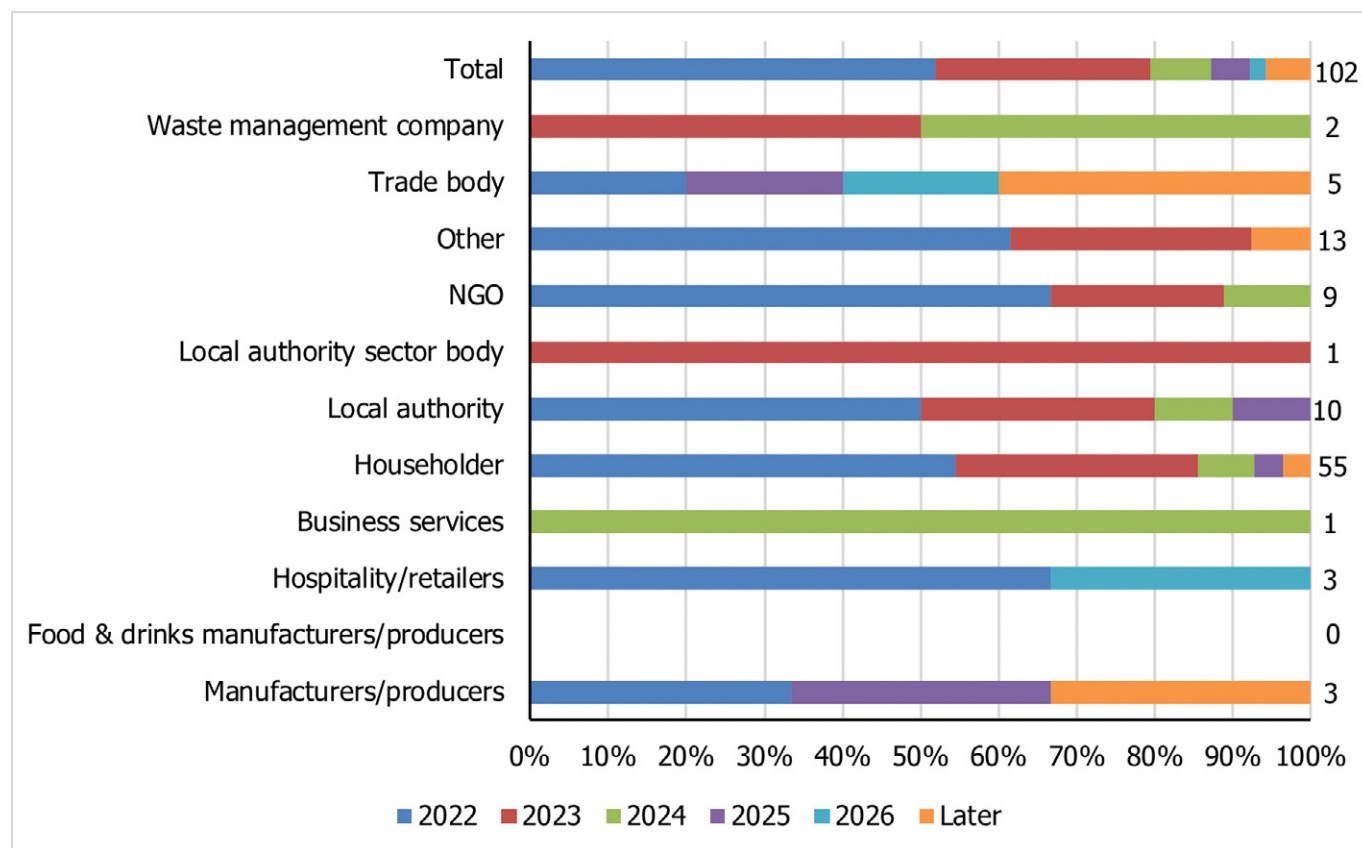


Figure 20 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). It is important to note that 32% of respondents did not answer the question. From the responses provided, the preferred date for a ban on Takeaway food containers to be introduced is '2022', answered by 35% of respondents, followed by year '2023', answered by 19% of respondents. Years '2024', '2025', '2026' and 'Later' received low response rates.

By respondent category, the majority of Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (73%), Business services (75%), Local authority sector bodies (50%) and Trade bodies (67%) did not answer the question. Of the Hospitality/retailers that did answer, the year '2022' was favoured. Householders (53%), Local authorities (45%), NGOs (67%) and Other (57%) also preferred year '2022' for the introduction of a ban. Of the Local authority sector bodies that did answer the question, '2023' was favoured, along with 50% of Waste management companies. The other 50% of Waste management companies selected year '2024'.



5.1.2 Pre-filled food containers

2022:	48 responses (32%)
2023:	24 responses (16%)
2024:	8 responses (5%)
2025:	6 responses (4%)
2026:	4 responses (3%)
Later:	9 responses (6%)
Not answered:	51 responses (34%)

Figure 21: In what year should a ban on SUP food containers be introduced? Pre-filled food containers (Single choice)

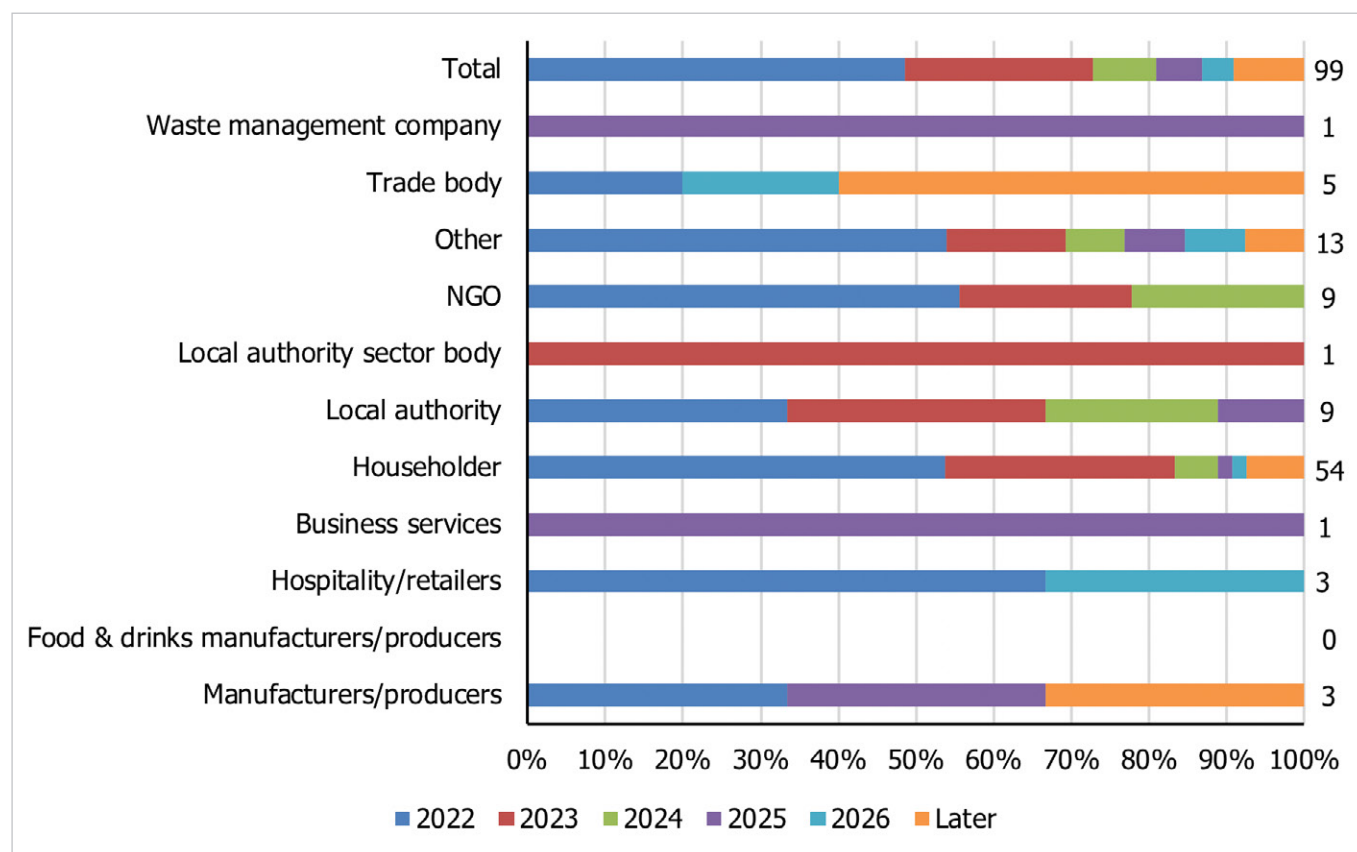


Figure 21 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Note, 34% of respondents did not answer the question. In total, the preferred date for a ban on SUP Pre-filled containers to be introduced is '2022', answered by 32% of respondents, followed by year '2023', answered by 16% of respondents. Years '2024', '2025', '2026' and 'Later' received low response rates.

By respondent category, the majority of Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (73%), Business services (75%), Local



authority sector bodies (50%), Trade bodies (67%) and Waste management companies (50%) did not answer the question. Of the Hospitality/retailers that did answer, the year '2022' was favoured. Householders (51%), NGOs (56%) and Other (50%) also preferred year '2022' for the introduction of a ban. Of the Local authority sector bodies that did answer the question, '2023' was favoured. Of the Waste management companies that answered the question, year '2025' was favoured. Of the Trade bodies that answered the question, 'Later' than 2026 was favoured. Local authorities were mainly split between years '2022' (27%) and '2023' (27%).

5.1.3 Self-fill food containers

2022:	54 responses (36%)
2023:	26 responses (17%)
2024:	6 responses (4%)
2025:	6 responses (4%)
2026:	3 responses (2%)
Later:	6 responses (4%)
Not answered:	49 responses (33%)

Figure 22: In what year should a ban on SUP food containers be introduced? Self-fill food containers (Single choice)

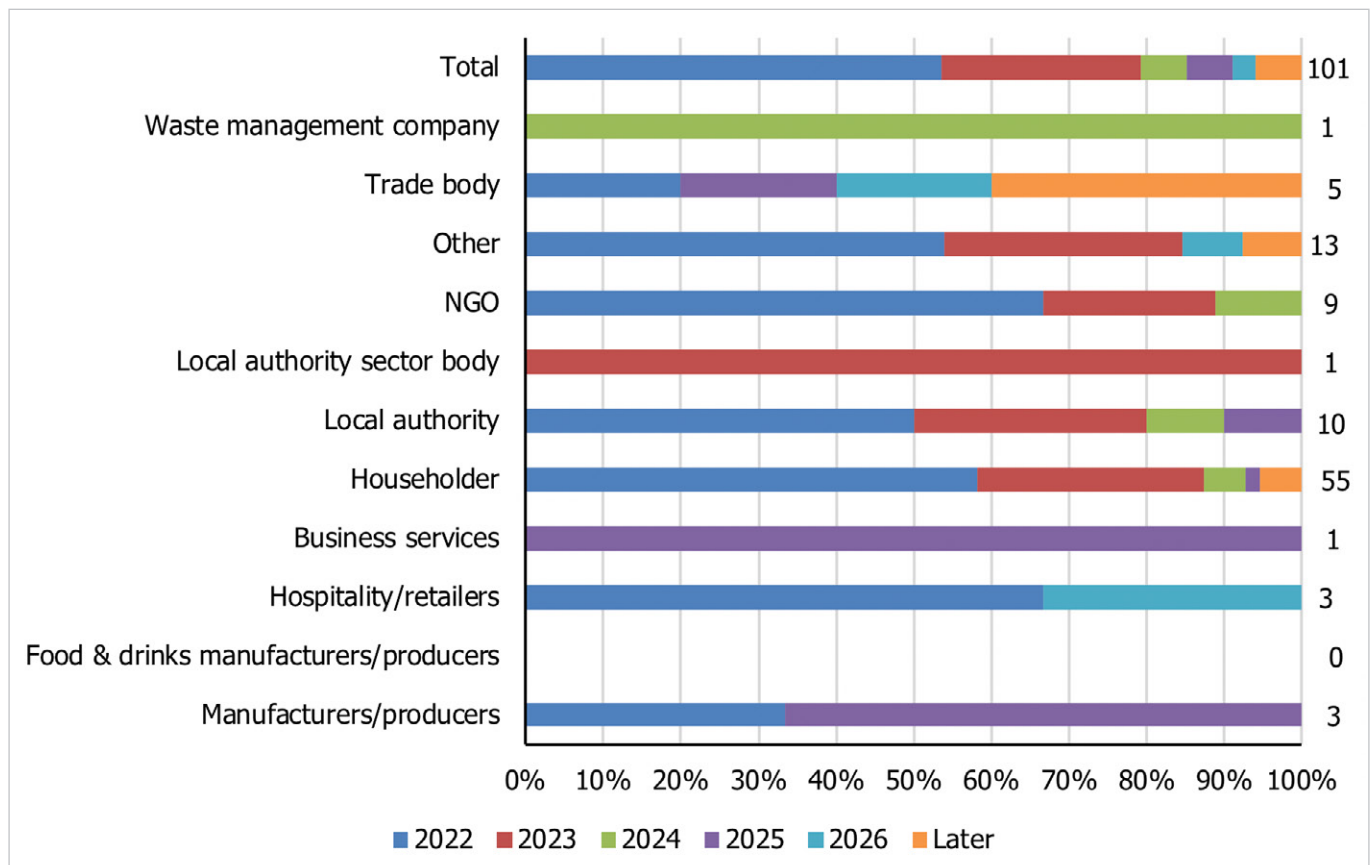




Figure 22 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes ‘Not Answered’). Note, 33% of respondents did not answer the question. In total, the preferred date for a ban on SUP Self-fill containers to be introduced is ‘2022’, answered by 36% of respondents, followed by year ‘2023’, answered by 17% of respondents. Years ‘2024’, ‘2025’, ‘2026’ and ‘Later’ received low response rates.

By respondent category, the majority of Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (73%), Business services (75%), Local authority sector bodies (50%), Trade bodies (67%) and Waste management companies (50%) did not answer the question. Of the Hospitality/retailers that did answer, the year ‘2022’ was favoured. Householders (56%), Local authorities (45%), NGOs (67%) and Other (50%) also preferred year ‘2022’ for the introduction of a ban. Of the Local authority sector bodies that answered the question, ‘2023’ was favoured. Of the Waste management companies that answered the question, year ‘2024’ was favoured.

5.2 Levy

Question 24. If a levy on SUP food containers were introduced what level should it be set at? (Single choice)

The Impact Assessment work undertaken for this consultation suggested the levy charge be set at 50p per SUP food container. This question was designed to assess what the preferred level of the levy was and how this differed from the modelled value.

£0.25 - £0.49:	19 responses (13%)
£0.50 - £0.74:	29 responses (19%)
£0.75 - £0.99:	14 responses (9%)
£1.00 - £1.24:	13 responses (9%)
£1.25 - £1.50:	18 responses (12%)
Other:	50 responses (33%)
Not answered:	7 responses (5%)



Figure 23: If a levy on SUP food containers were introduced what level should it be set at? (Single choice)

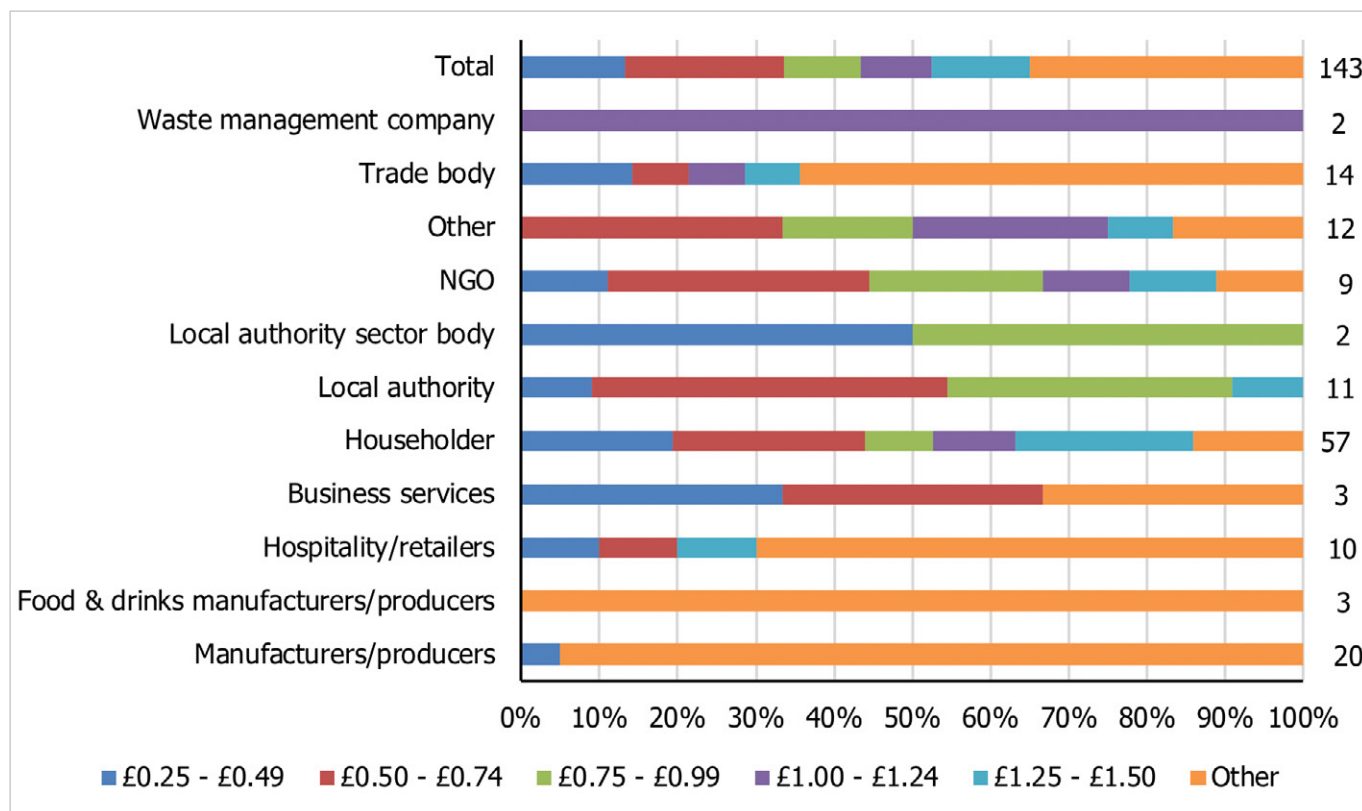


Figure 23 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Overall, responses to this question are mixed. The option with the highest percentage of responses (33%) was 'Other' - detailed below. Of the respondents who selected a specific levy fee, the charge of £0.50 - £0.74' had the highest response rate, making up 19% of overall responses. All other values listed, made up between 9% and 13% of the total responses.

There is some variation in response by respondent category. The highest response rate for Manufacturers/producers (86%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (64%) and Trade bodies (60%) was 'Other'. Respondents from Business services preferred '£0.25-£0.49' (25%), '£0.50-£0.74' (25%) and 'Other' (25%) equally. The '£0.50 - £0.74' charge was also favoured amongst 45% of Local authorities. Householders, NGOs and Other were fairly evenly split across each fee listed, excluding the lowest '£0.25 - £0.49' charge for the Other category type. 100% of Waste management companies selected the '£1.00 - £1.24' fee.

Respondents who answered 'Other' were asked to explain their choice:

50 respondents answered 'Other', and 49 left a comment.

41 respondents do not support a levy. Reasons given include the perceived economic impact to householders, government and businesses in the implementation a levy. Respondents expect that a levy would particularly impact smaller businesses and poorer households and the



additional economic costs and policy unknowns to manufacturers and producers of upcoming policies, namely the PPT, DRS and EPR.

4 respondents suggested a levy charge under £0.24.

Question 25. Would a levy be effective in reducing the consumption of pre-filled plastic food containers? (Single choice)

This question was asked to gauge whether stakeholders view a levy as effective in meeting the legislations aims.

Yes:	81 responses (54%)
No:	30 responses (20%)
Don't know:	36 responses (24%)
Not answered:	3 responses (2%)

Figure 24: Would a levy be effective in reducing the consumption of pre-filled plastic food containers? (Single choice)

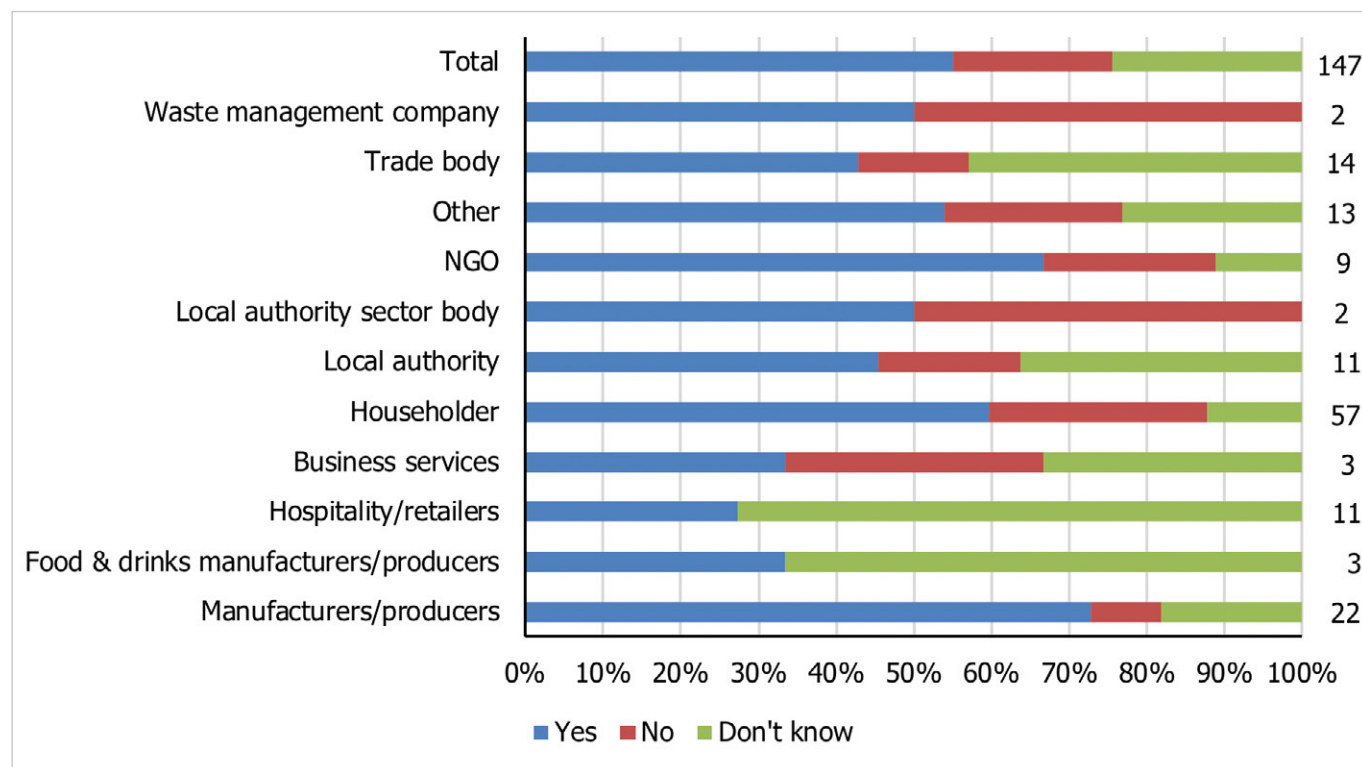


Figure 24 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). 54% of total respondents answered 'Yes', a levy would be effective in reducing the consumption of pre-filled plastic food containers. 'No' and 'Don't know' received similar responses rates, with 20% and 24% respectively.



By respondent category, the highest percentage of Manufacturers/producers (73%), Householders (60%), Local authorities (45%), NGOs (67%) and Other (50%) selected 'Yes'. Both Local authority sector bodies and Waste management companies were split equally between 'Yes' and 'No'. 'Don't know' was answered by the majority of Food & drinks manufacturers/producers (67%) and Hospitality/retailers (73%).

Question 26. If respondents answered 'Yes' to question 25, respondents were asked to detail how a levy on pre-filled plastic food containers could be implemented in terms of scheme administration, monitoring, and applications

81 respondents answered 'Yes', 58 respondents left a comment.

In terms of scheme application, in an identical response given by mostly Manufacturers/producers, Trade bodies and Food & drinks manufacturers/producers, 18 comments mention the use of trading standards, though note that standards are likely to cause an administrative burden on producers. There were further suggestions on the application of the levy itself. 6 respondents, from a majority of NGOs and the Other category type, thought a levy should be placed on manufacturers and/or producers. 5 respondents, from various stakeholder groups, favoured a levy at the point of payment. The success of the plastic bag levy was mentioned by 5 respondents, largely Householders, with calls to replicate this.

In terms of scheme administration, 5 respondents from a mix of stakeholder groups recommended a scheme administrator and an administrative body.

There were a range of ideas regarding monitoring, though there was no consistency by stakeholder group found. 3 respondents suggested producers monitor a levy. 1 respondent suggested businesses should be monitored by raw materials costs and 1 respondent suggested that a levy be monitored directly by fees raised.

7 respondents, made up of mostly Local authorities and NGOs, noted the importance of national communications and campaigns to impart citizen behaviour change on SUPs, packaging with the levy clearly marked being a popular suggested approach.

Question 27. If respondents answered 'No' to question 25, respondents were asked why a levy on pre-filled SUP food containers would be ineffective.

30 respondents answered 'No', 26 left comments.

13 respondents, made up of mostly Householders and Manufacturers/producers, believed that a levy on pre-filled SUP food containers would be ineffective as the disincentive would be too low to enable impactful behavioural citizen change, with many consumers remaining unaware of the levy and the reasoning behind it.



7 respondents, from the majority of the Householder category type, view the reduction of SUP consumption as a producer responsibility and do not agree that consumers should pay for a levy.

3 respondents, made up of NGO's and Other state that any SUP policy should focus on promoting re-use, recycling, re-fill and reducing litter.

Question 28. Would a levy on producers be more or less effective in reducing consumption of SUP packaging than a levy on consumers? (Single choice)

It is proposed that the levy should take the form of a charge that is visible to the consumer. The levy could instead be placed on producers, this would mean the levy was less visible. This question was asked to find out stakeholder views on whether a levy would be more effective on consumers or producers in meeting the legislations aims.

More:	40 responses (27%)
The same:	26 responses (17%)
Less:	27 responses (18%)
Don't know:	51 responses (34%)
Not answered:	6 responses (4%)

Figure 25: Would a levy on producers be more or less effective in reducing consumption of SUP packaging than a levy on consumers? (Single choice)

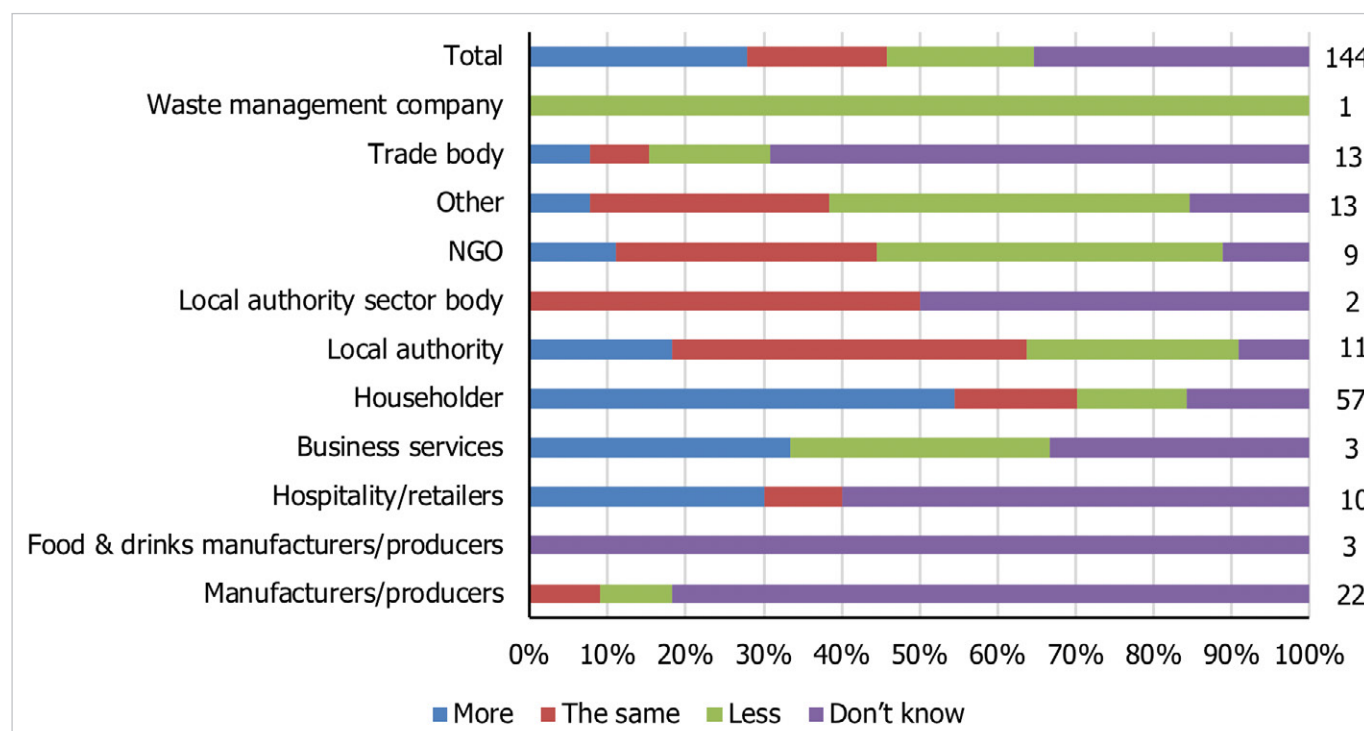


Figure 25 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). When asked 'Would a levy on producers be more or less effective in reducing consumption of SUP packaging than a levy on consumers?',



the greatest proportion of total respondents (34%) answered 'Don't know'. 27% of respondents answered that a levy on producers would be 'More' effective than on consumers. 'The same' and 'Less' received similar response rates, at 17% and 18% respectively.

There is variation in response by respondent category. The majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%) and Trade bodies (60%) answered 'Don't know'. Local authority sector bodies were split between 'Don't know' and 'The same'. Business services were split between 'Don't know', 'The same' and 'More'. The only category type with the majority of respondents selecting 'More' were Householders (54%). The only category type with the majority of respondents selecting 'The same' were Local authorities (45%). Whilst NGOs (44%), Other (43%) and Waste management companies (50%) answered that a levy on producers would be 'Less' effective in reducing SUP consumption than consumers.

5.3 Voluntary scheme

Question 29. Do you believe a voluntary scheme for SUP food containers, of any form, would be effective in meeting the proposed reductions? (Single choice)

A voluntary retailer-led scheme could be initiated and set up by the retail sector to reduce the usage of SUP food containers. Organisations may choose to work together as part of a joint initiative or follow diverse plans. This question was asked to gauge whether stakeholders view a voluntary scheme as effective in meeting the legislations aims.

Yes:	68 responses (45%)
No:	72 responses (48%)
Not answered:	10 responses (7%)



Figure 26: Do you believe a voluntary scheme for SUP food containers, of any form, would be effective in meeting the proposed reductions? (Single choice)

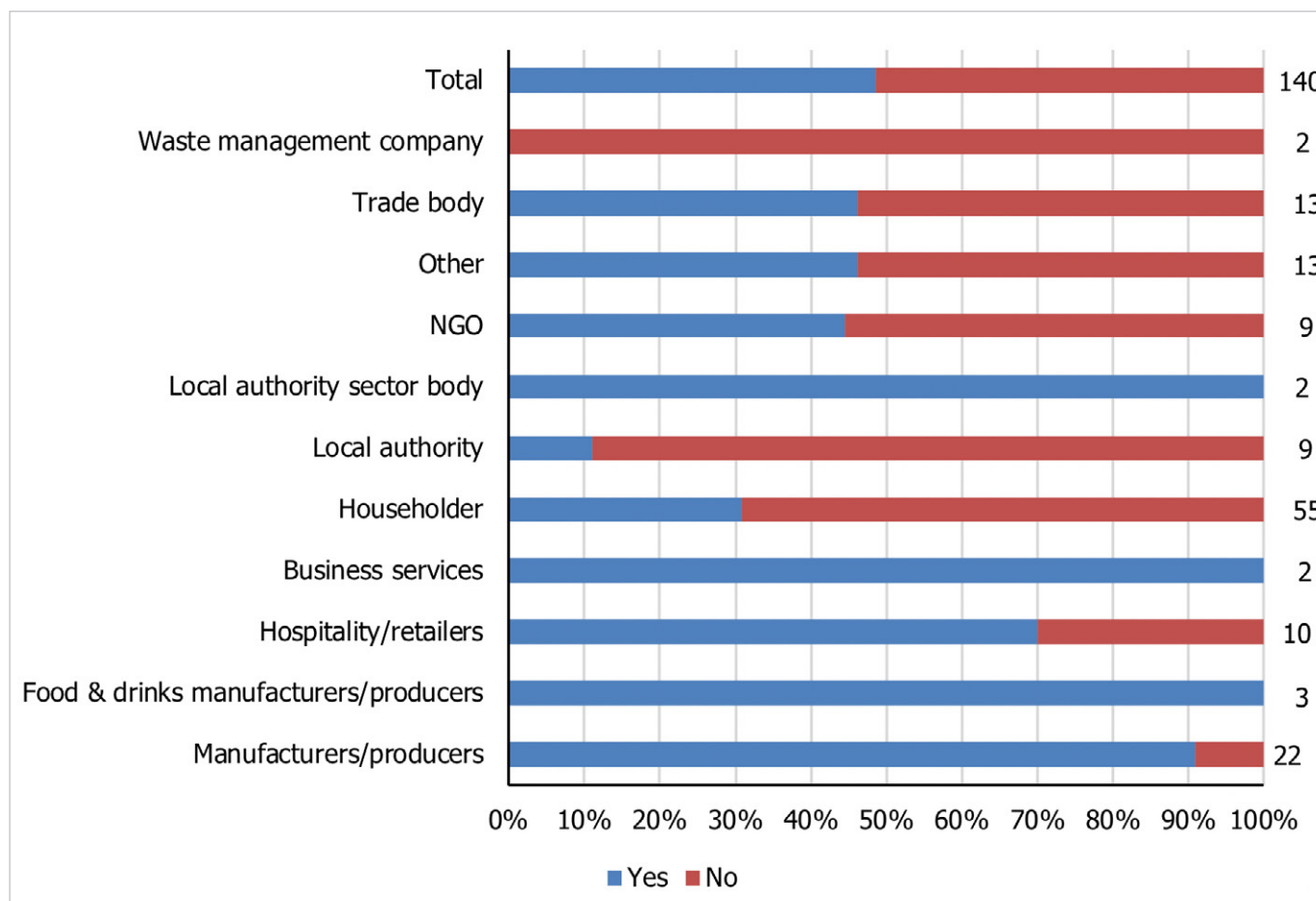


Figure 26 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). There was a near even split between respondents answering 'Yes' and 'No'. 'No' made up 45% of all respondents, whilst 'Yes' made up 48%.

By respondent category, the majority of Manufacturers/producers (91%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (64%), Business services (50%) and Local authority sector bodies (100%) answered 'Yes', a voluntary scheme for SUP food containers would be effective in meeting the proposed reductions. NGOs, Other and Trade bodies were generally split between 'Yes' and 'No'. The majority of Householders (67%), Local authorities (73%) and Waste management companies (100%) responded 'No'.

If respondents answered 'Yes' to question 29, respondents were asked what design of voluntary scheme would be successful in terms of scheme administration, monitoring, and applications.

68 respondents answered 'Yes', 58 left comments.

In an identical response, 19 respondents called for a Roundtable with stakeholders on improving the collection of food containers.



There were a number of suggestions in terms of scheme application. 5 respondents suggested incentives for re-use/SUNPs on consumers e.g., discount, reward and refund. 4 respondents mentioned innovative refundable and/or return models, with models in Europe noted as examples. 3 respondents noted the importance of national communications and campaigns to bring awareness and impart citizen behaviour change on SUPs.

In terms of monitoring, 1 respondent suggested the scheme should be overseen by a penalty mechanism for non-compliance.

There were no responses regarding scheme administration.

Question 30. What are the key elements for a successful voluntary scheme for SUP food containers? (Multiple-choice)

This question was asked to find out what elements of a voluntary scheme stakeholders view as key in reducing the consumption of SUP food containers.

The ability to in some way enforce signatories to enact the agreement:	87 responses (70%)
For either internal or external monitoring to be conducted:	85 responses (69%)
For a significant amount of the effected organisations (by sales volume) to be signed up:	70 responses (56%)
A consumer facing communications campaign explaining the purpose and aims of the agreement:	95 responses (77%)
For the agreement to contain agreed action for all signatories to undertake:	86 responses (69%)
For signatories to the agreement to have flexibility in achieving the aims of the agreement:	39 responses (31%)
Other:	14 responses (11%)
Not answered:	26 responses (17%)



Figure 27: What are the key elements for a successful voluntary scheme for SUP food containers? (Multiple-choice)

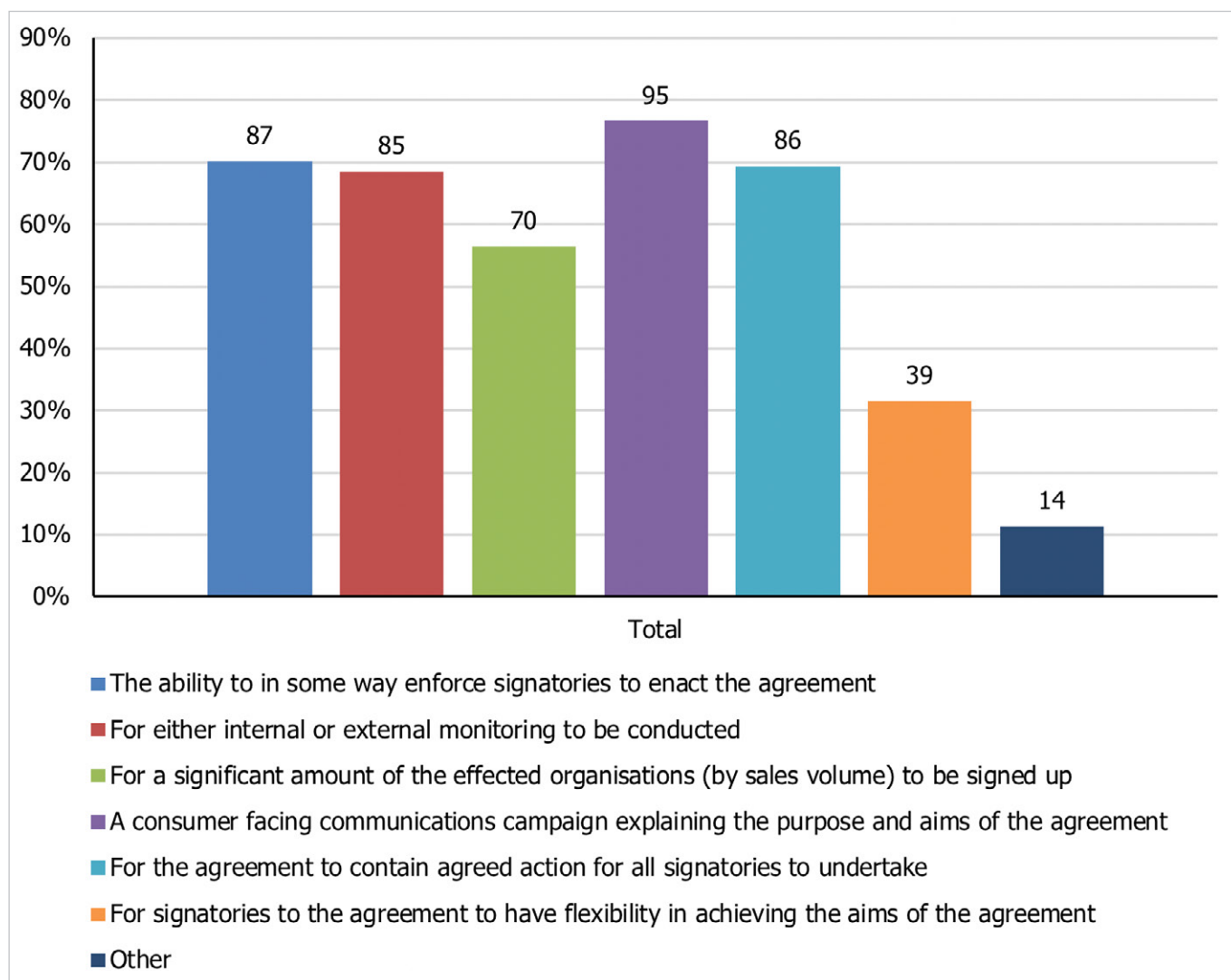


Figure 27 shows the total number of respondents selecting the key elements for a successful voluntary scheme for SUP food containers outlined in question 30. Figure 26 is based only on those who answered (i.e. excludes 'Not Answered'). The majority of key elements addressed in the question received a relatively high response rate across all respondents. 77% of respondents selected 'A consumer facing communications campaign explaining the purpose and aims of the agreement', 70% of respondents selected 'The ability to in some way enforce signatories to enact the agreement' and both 'For either internal or external monitoring to be conducted' and 'For the agreement to contain agreed action for all signatories to undertake' were answered by 69% of respondents. 56% of respondents answered, 'For a significant amount of the effected organisations (by sales volume) to be signed up'. Out of the elements listed, 'For signatories to the agreement to have flexibility in achieving the aims of the agreement' received the lowest response rate at 31%, followed by 'Other' - detailed below, answered by 11% of total respondents.



Table 6 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). High numbers from all respondent categories selected, 'The ability to in some way enforce signatories to enact the agreement', 'For either internal or external monitoring to be conducted' and 'A consumer facing communications campaign explaining the purpose and aims of the agreement', with between 56% and 100% of respondents from each category selecting those listed. Apart from Householders, 67% to 100% of each respondent category also favoured 'For the agreement to contain agreed action for all signatories to undertake'. Householders (70%), Local authorities (78%), Local authority sector bodies (100%), NGOs (57%), Other (78%) and Waste management companies (100%) also favoured 'For a significant amount of the effected organisations (by sales volume) to be signed up'. Across all category types 'For signatories to the agreement to have flexibility in achieving the aims of the agreement' was the least popular element listed, though 100% of Local authority sector bodies, 57% of NGOs and 56% of Other selected this option. 'Other' received a low response rate from all category types apart from Business services (67%).

Respondents who answered 'Other' were asked to explain their choice:

14 respondents answered 'Other' and left comments.

5 respondents do not support a voluntary scheme, with some raising concerns over the effectiveness of a voluntary scheme.

3 respondents note the need for environmental impact assessments on alternative SUPs.

There were no other common themes found in the comments.



Table 6: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	The ability to in some way enforce signatories to enact the agreement	For either internal or external monitoring to be conducted	For a significant amount of the effected organisations (by sales volume) to be signed up	A consumer facing communications campaign explaining the purpose and aims of the agreement	For the agreement to contain agreed action for all signatories to undertake	For signatories to the agreement to have flexibility in achieving the aims of the agreement	Other	Not answered	Total answered
Manufacturers/ producers	77%	77%	27%	91%	86%	14%	9%	0%	22
Food & drinks manufacturers/ producers	100%	100%	0%	100%	100%	0%	0%	0%	3
Hospitality/ retailers	73%	73%	45%	91%	82%	27%	18%	0%	11
Business services	67%	67%	33%	67%	67%	33%	67%	25%	3
Householder	68%	55%	70%	55%	49%	32%	9%	18%	47
Local authority	56%	89%	78%	78%	67%	44%	11%	18%	9
Local authority sector body	100%	100%	100%	100%	100%	100%	0%	50%	1
NGO	57%	71%	57%	100%	86%	57%	14%	22%	7
Other	78%	78%	78%	100%	89%	56%	0%	36%	9
Trade body	64%	64%	45%	82%	73%	27%	18%	27%	11
Waste management company	100%	100%	100%	100%	100%	0%	0%	50%	1



6.0 Preferred approach

6.1 Modelling

A series of models were used to create scenarios for each of the policy options in order to assess each policy option in reducing the consumption of SUP beverage cups and food containers. The figures and assumptions used to underpin the modelling are set out in the 'An Introduction to the Single-use Plastics Assessment Framework' report.

Question 31. Do you agree with the results of the modelling? (Single choice)

This question was asked to find out whether stakeholders approve of the modelling for SUP cups and food containers in the consultation. Note, the question has been split by SUP cups -section 6.1.1, and food containers - section 6.1.2.

6.1.1 Cups

Yes:	75 responses (50%)
No:	56 responses (37%)
Not answered:	19 responses (13%)



Figure 28: Do you agree with the results of the modelling? - Cups (Single choice)

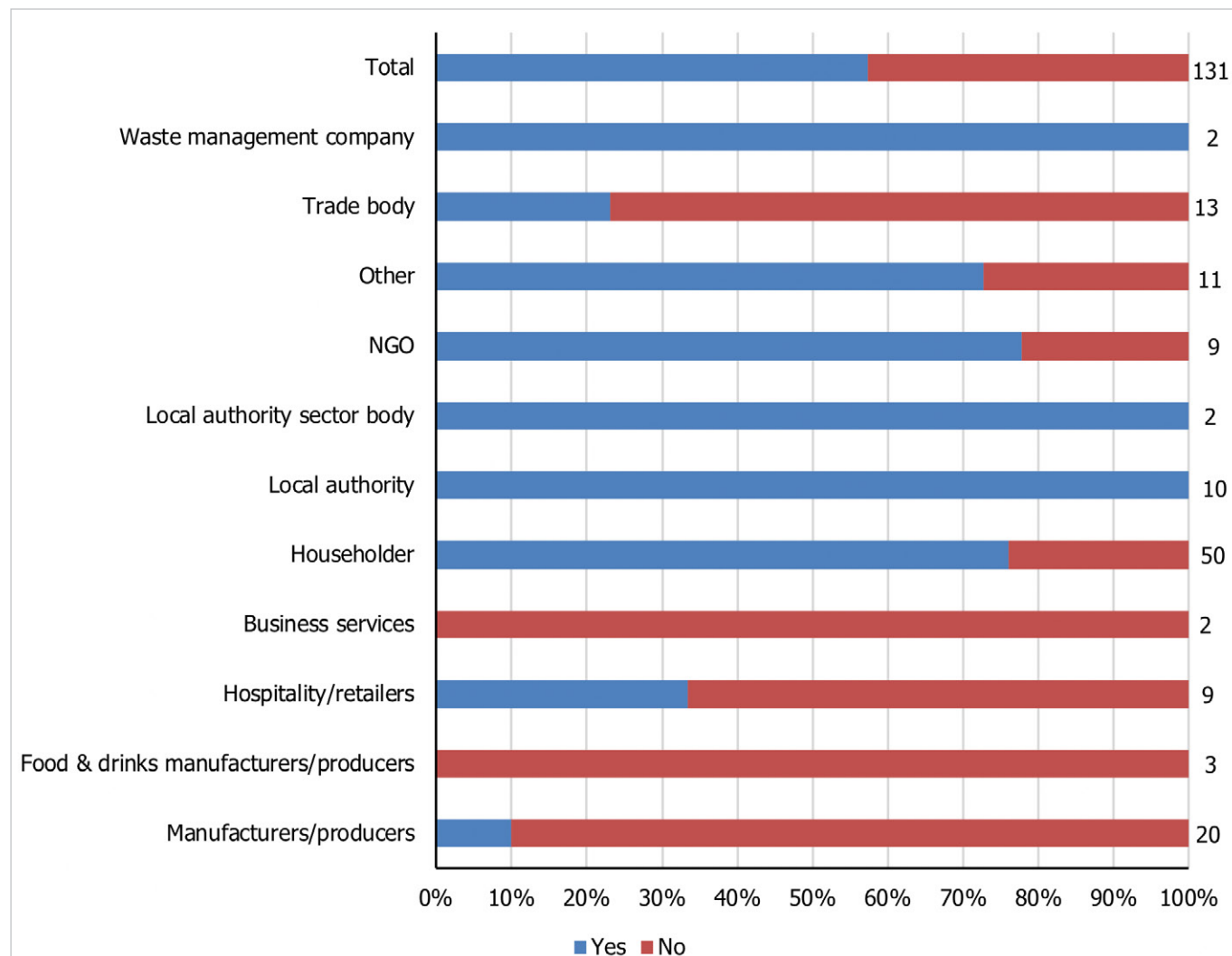


Figure 28 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). The majority of respondents (50%) answered 'Yes', agreeing with the results of the modelling. 'No' makes up 37% of responses for this question.

By respondent category, the majority of Householders (67%), Local authorities (91%), Local authority sector bodies (100%), NGOs (78%), Other (57%) and Waste management companies (100%) agreed with the results of the modelling, answering 'Yes'. The majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%), Business services (50%) and Trade bodies (67%) disagreed with modelling, answering 'No'.

Respondents who answered 'No' for cups were asked to explain their choice:

56 respondents answered 'No', and 51 left a comment.

23 respondents commented under the theme market size. In an identical response, 21 respondents stated that the assumptions applied, the source of raw data, and how the raw data estimates were produced for each SUP item market size were not clear. The identical response



states that the baseline is unrepresentative, as the breakdown between different business sizes under-estimates the market size of small businesses and does not fully consider the Covid-19 pandemic and its negative impact on trade.

15 respondents state that there was a lack of evidence and information on the modelling of SUP alternatives, as well as information surrounding the environmental, hygienic and economic impacts of the proposed policies.

5 respondents do not believe that the proposals would be as effective within the timelines outlined in the Consultation.

There were no common themes found in other comments.

6.1.2 Food containers

Yes:	74 responses (49%)
No:	57 responses (38%)
Not answered:	19 responses (13%)

Figure 29: Do you agree with the results of the modelling? - Food containers (Single choice)

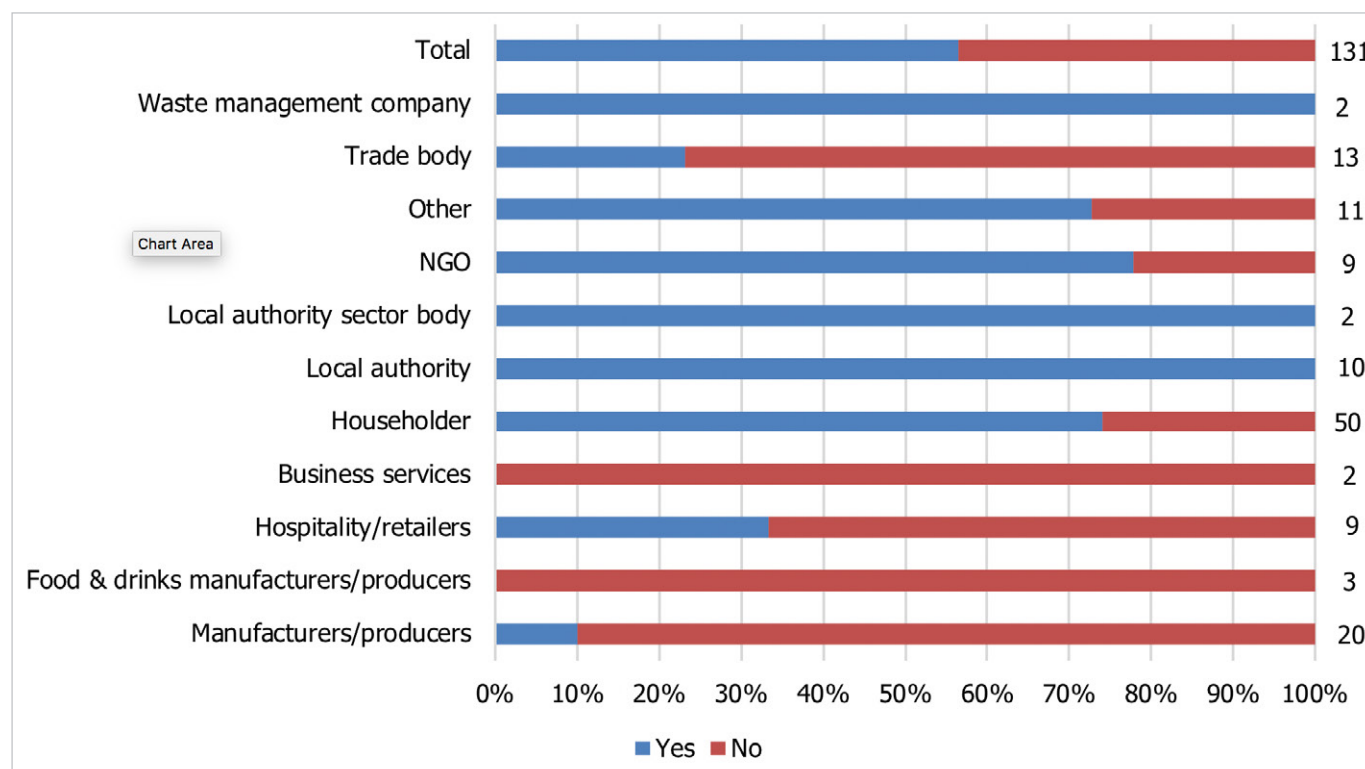


Figure 29 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). The majority of respondents (49%) answered 'Yes', agreeing with the results of the modelling. 'No' makes up 38% of responses for this question.



By respondent category, the majority of Householders (65%), Local authorities (91%), Local authority sector bodies (100%), NGOs (78%), Other (57%) and Waste management companies (100%) agreed with the modelling, answering ‘Yes’. The majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%), Business services (50%) and Trade bodies (67%) disagreed with modelling, answering ‘No’.

Respondents who answered ‘No’ for food containers were asked to explain their choice:

57 respondents answered ‘No’, 38 left a comment. The majority of responses followed the same themes given to cups above in section 6.1.1.

In an identical response, 17 respondents stated that the assumptions applied, the source of raw data, and how the raw data estimates were produced for each SUP item market size were not clear. The identical response states that the baseline is unrepresentative, as the breakdown between different business sizes under-estimates the market size of small businesses and does not fully consider the Covid-19 pandemic and its negative impact on trade.

11 respondents state that there was a lack of evidence and information on the modelling of SUP alternatives, as well as information surrounding the environmental, hygienic and economic impacts of the proposed policies.

6 respondents do not believe that the proposals would be as effective within the timelines outlined in the Consultation.

There were no common themes found in other comments.

6.2 Preferred approach

6.2.1 Cups

Question 32. What is your preferred option to meet the goals of the legislation? - Cups (Single choice)

The aim of the proposed policies is to ensure a sustained and substantial reduction in SUP beverage cups and food containers. This question was asked to gather the positions of stakeholders on their preferred approach to meeting the legislation’s aims for SUP cups.

• Ban:	62 responses (41%)
• Levy:	27 responses (18%)
• Voluntary Scheme:	30 responses (20%)
• Other:	27 responses (18%)
• Not answered:	4 responses (3%)



Figure 30: What is your preferred option to meet the goals of the legislation? - Cups
(Single choice)

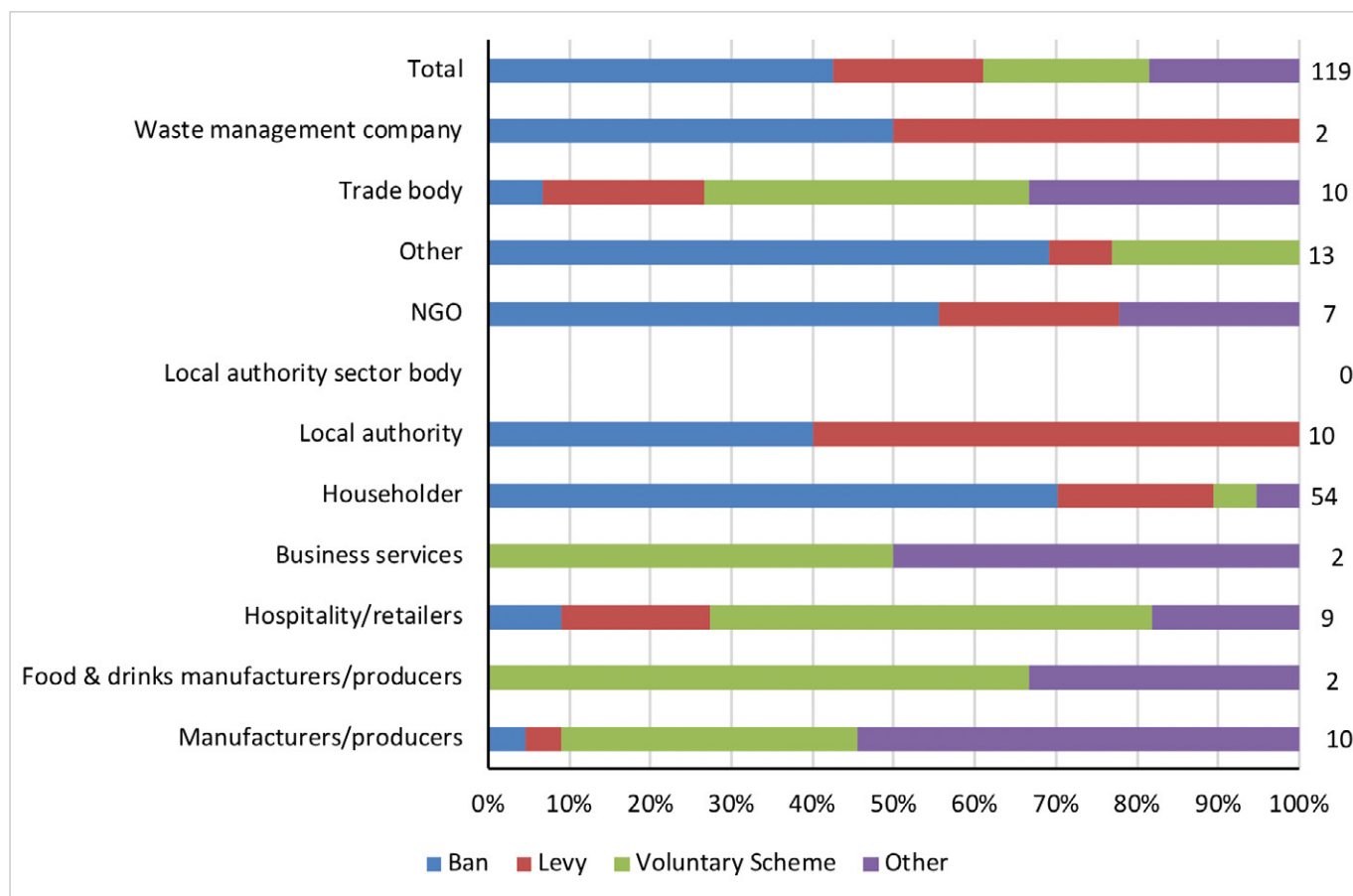


Figure 30 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Across all respondents the preferred option to meet the goals of the legislation is a 'Ban', making up 41% of responses. A 'Voluntary scheme' is the second favoured approach, making up 20% of responses, closely followed by a 'Levy', with 18% of responses. 'Other' - detailed below, also made up 18% of total responses.

By respondent category, a 'Ban' was the preferred approach for Householders (70%), NGOs (56%) and Other (64%). Waste management companies were evenly split between a 'Ban' and a 'Levy'. A 'Levy' was the preferred policy measure for only Local authority (55%) category types, but the second favoured option for Hospitality/retailers, Householders and NGOs. The majority of Food & drinks manufacturers/producers (67%), Hospitality/retailers (55%) and Trade bodies (40%) preferred a 'Voluntary Scheme'. Business services were evenly split between a 'Voluntary scheme' and 'Other'. 'Other' received the highest response rate from Manufacturers/producers (55%).

Respondents who answered 'Other' were asked to explain their choice:

27 respondents answered 'Other' and left comments.



21 respondents favour a mandatory take-back scheme to meet the goals of the legislation.

2 respondents prefer a deposit return scheme.

2 respondents prefer the implementation of all policy options in a staged approach, starting with voluntary scheme, followed by a levy and then a ban.

Question 33. Please describe why the proposed policy was your preferred option for cups.

Consultees were asked to explain their perspective.

6.2.2 Ban

62 respondents answered 'Ban', and 48 left a comment.

24 respondents, made up of majority Householders, view a ban as the most effective policy measure in meeting the legislation, as well as protecting the environment. They state that a ban would enable outright enforcement but requires clear citizen communications and functional SUP alternatives to ensure success.

12 respondents, made up of majority Householders, state that a ban would ensure compliance from consumers and/or producers in contrast to a levy or voluntary scheme. Comments state a ban would be time-effective in reducing SUPs and littering.

10 respondents, made up of majority Householders and the Other category type, state that SUP alternatives are, or will become, widely available following a ban. They argue that a ban would force producers to find SUP alternatives and innovate.

6.2.3 Levy

27 respondents answered 'Levy', and 22 left a comment.

9 respondents, made up of all Householders, claimed that a levy would enable time for consumer behaviour change and for producers to adapt to SUP alternatives and innovate.

7 respondents, from a mix of stakeholder groups, stated that a financial incentive/disincentive would be effective in encouraging recycling and drive uptake in re-use and re-fill.

3 respondents, from the majority of the Other category type, favoured a levy as they perceived the ban being too restrictive and would attract criticism from the public.



6.2.4 Voluntary scheme

30 respondents answered 'Voluntary scheme', 25 left comments.

20 respondents, from a range of stakeholder groups gave an identical response. These consultees favour a mandatory take-back scheme of cups. They state that a mandatory scheme would be the most effective measure in terms of both protecting the environment and economics.

4 respondents prefer a voluntary scheme, as they view the policy measure as the least disruptive to business and would allow retailers to tailor schemes in accordance with their own circumstances.

6.2.5 Other

27 respondents answered 'Other' and left a comment.

In an identical response, 16 respondents, made up of a majority of Manufacturers/producers, Food & drinks manufacturers/producers and Trade bodies, favour a mandatory take-back scheme of cups. No explanation detailed.

3 respondents view each of the proposed policies ineffective in meeting the legislations aims.

2 respondents prefer all policy options in a staged approach, starting with voluntary scheme, followed by a levy and then a ban as it would provide businesses and producers time to adapt.

2 respondents noted down DRS.

1 respondent mentioned EPR, stating that EPR would provide improved collections and recycling, where profits can be invested in recycling infrastructure.

6.3 Food containers

Question 34. What is your preferred option to meet the goals of the legislation? - Food containers (*Single choice*)

This question was asked to gather the positions of stakeholders on their preferred approach to meeting the legislation's aims for SUP food containers.

Ban:	56 responses (39%)
Levy:	30 responses (21%)
Voluntary Scheme:	46 responses (32%)
Other:	13 responses (9%)
Not answered:	5 responses (3%)



Figure 31: What is your preferred option to meet the goals of the legislation? - Food containers (Single choice)

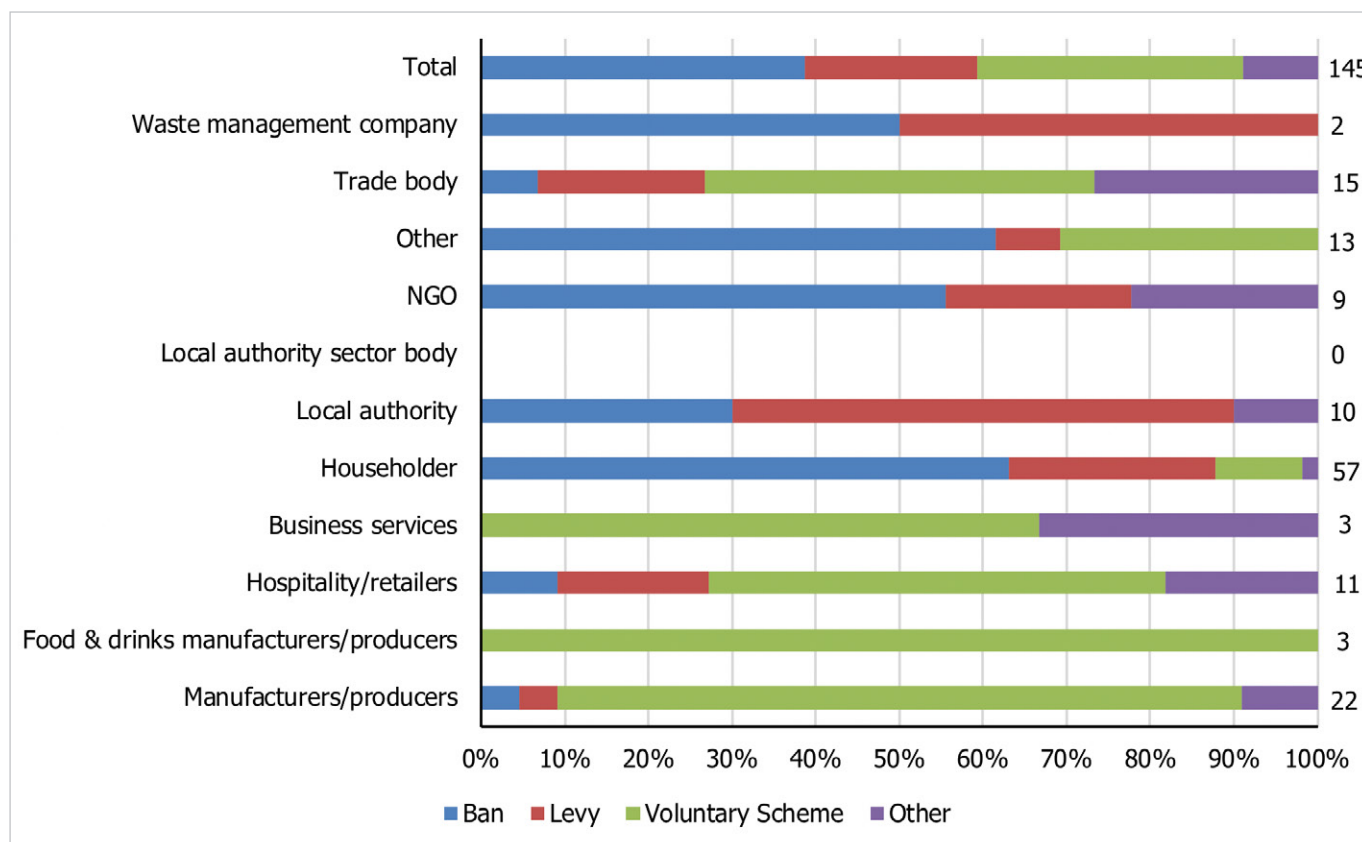


Figure 31 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Across all respondents the preferred option to meet the goals of the legislation is a 'Ban', making up 39% of responses. A 'Voluntary scheme' is the second favoured approach, making up 32% of responses, followed by a 'Levy', with 21% of responses. 'Other' - detailed below, made up 9% of total responses.

Table 7 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). By respondent category, a 'Ban' was the preferred approach for Householders (63%), NGOs (56%) and Other (57%). Waste management companies were evenly split between a 'Ban' and a 'Levy'. A 'Levy' was the preferred policy measure for only Local authority (55%) category types, but the second favoured option for Hospitality/retailers, Householders and NGOs. The majority of Manufacturers/producers (82%), Food & drinks manufacturers/producers (100%), Hospitality/retailers (55%) and Trade bodies (47%) preferred a 'Voluntary Scheme'. Business services were evenly split between a 'Voluntary scheme' and 'Other'.

Respondents who answered 'Other' were asked to explain their choice:

13 respondents answered 'Other', 12 left comments.



4 respondents would prefer the implementation of all policy options in a staged approach, starting with voluntary scheme, followed by a levy and then a ban.

4 respondents advocate that all materials used in food containers should be encompassed with the measures under EPR and that the profits gained should be invested in improved recycling infrastructure.

Please describe why the proposed policy was your preferred option for food containers.

Consultees were asked to explain their perspective.

6.3.1 Ban

56 respondents answered 'Ban', and 41 left a comment.

The majority of responses followed the same themes given to cups above in section 6.2.2.

24 respondents, made up of majority Householders, view a ban as the most effective policy measure in meeting the legislation, as well as protecting environment. They state that a ban would enable outright enforcement but requires clear citizen communications and functional SUP alternatives to ensure success.

10 respondents made up of majority Householders, state that a ban would ensure compliance from consumers and/or producers in contrast to a levy or voluntary scheme. Comments state a ban would be time-effective in reducing SUPs and littering.

8 respondents, made up of majority Householders, want the policy measures to the ban the use of all single-use materials in order to protect the environment.

5 respondents, made up of majority Householders and the Other category type, state that SUP alternatives are, or will become, widely available following a ban. They argue that a ban would force producers to find SUP alternatives and innovate.

6.3.2 Levy

30 respondents answered 'Levy', 23 left a comment.

The majority of responses followed the same themes given to cups above in 6.2.3.

10 respondents, from a mix of stakeholder groups, stated that a financial incentive/disincentive would be effective in encouraging recycling and drive uptake in re-use and re-fill.

4 respondents, made up of all Householders, claimed that a levy would enable time for consumer behaviour change and for producers to adapt to SUP alternatives and innovate.

2 respondents favoured a levy as they perceived the ban being too restrictive and would attract criticism from the public.



6.3.3 Voluntary scheme

46 respondents answered 'Voluntary scheme', 39 left a comment.

The majority of responses followed the same themes given to cups above in 6.2.4.

33 respondents in an identical response, from a range of category types, state that policy should focus on improved collection and recycling, financially maintaining smaller businesses and ensuring public and staff health and safety.

2 respondents prefer a voluntary scheme, as they view the policy measure as the least disruptive to business and would allow retailers to tailor schemes in accordance with their own circumstances.

6.3.4 Other

13 respondents answered 'Other' and left a comment.

The majority of responses followed the same themes given to cups above in 6.4.5.

7 respondents view future EPR policy as an effective method to reduce the impacts of SUP. A number of these respondents state that policy should focus on improved recycling and collections and argue that funds from EPR will help to finance improved kerbside collections and recycling infrastructure.

2 respondents prefer all policy options in a staged approach, starting with a voluntary scheme, followed by a levy and then a ban as it would provide businesses and producers time to adapt.



7.0 Administration and enforcement

Question 35. What should the proposed measures include to be successful/effective? (Multiple-choice)

This question was asked to gauge what aspects stakeholders view as important for the proposed policies to meet the legislations aims.

Penalties for non-compliance, for example fines:	86 responses (64%)
Provision of clear guidance on, scope, obligations, actions etc...:	107 responses (80%)
Creation of a scheme administrator/regulator:	86 responses (64%)
Provision of independent monitoring:	90 responses (67%)
Other:	31 responses (23%)
Not answered:	16 responses (11%)

Figure 32: What should the proposed measures include to be successful/effective?
(Multiple-choice)

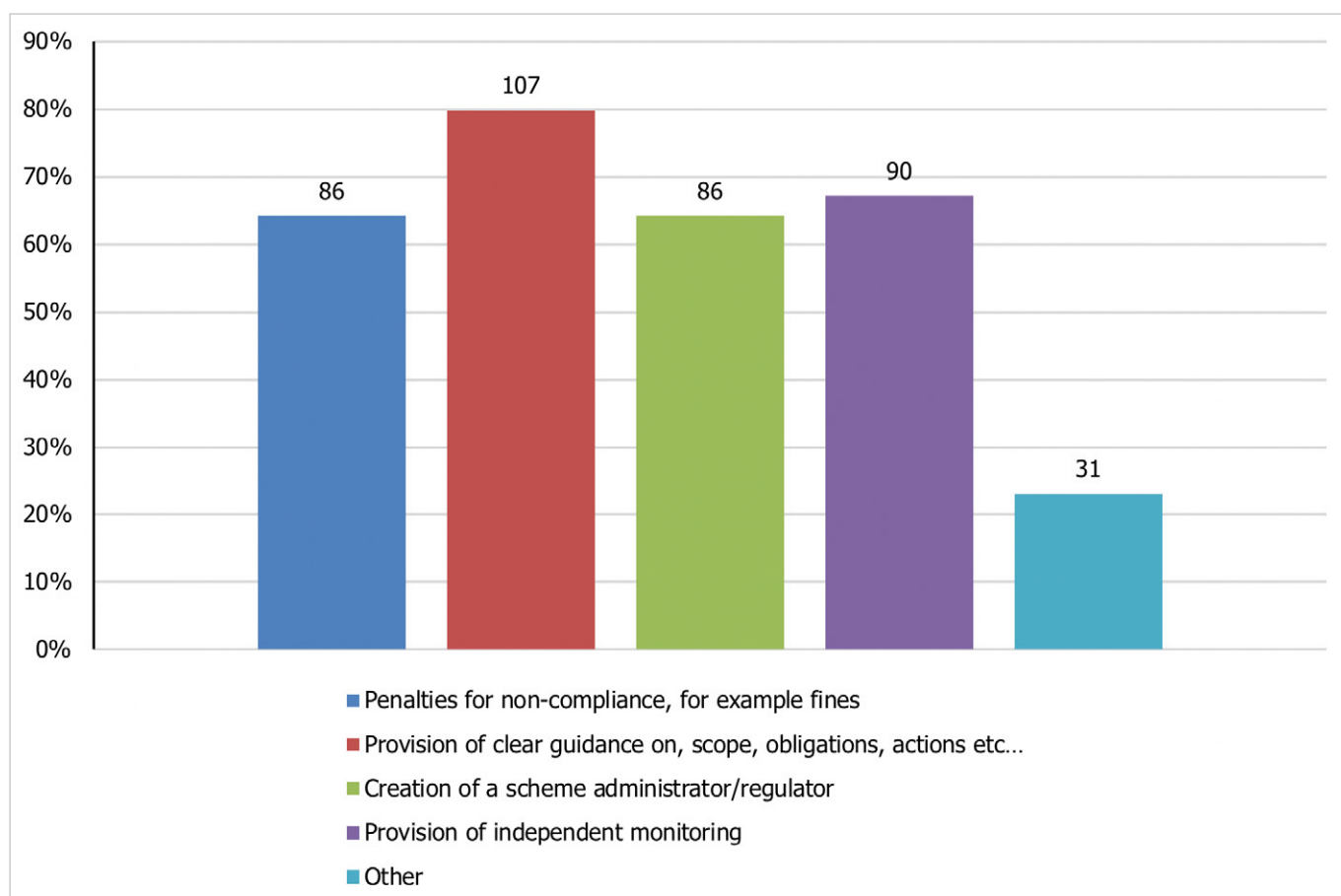




Figure 32 shows the total number of respondents selecting elements to include for policies to be successful/effective and is based only on those who answered (i.e. excludes 'Not Answered'). Excluding 'Other' - detailed below, each element listed received high response rates. 80% of respondents agreed that 'The 'Provision of clear guidance on, scope, obligations, actions etc...'' should be included for policy success. 'Provision of independent monitoring' was answered by 67% of respondents. Both 'Penalties for non-compliance, for example fines' and 'Creation of a scheme administrator/regulator' were answered by 64% of respondents.

Table 7 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). The 'Provision of clear guidance on, scope, obligations, actions etc...' received high response rates from each category, ranging from 50% to 100%. Both the 'Creation of a scheme administrator/regulator' and the 'Provision of independent monitoring' also received high response rates, ranging from 50% to 100% from all category types, excluding Householders and Business services respectively. 'Penalties for non-compliance, for example fines' received mixed response rates by category type. 50% to 100% of Business services, Householders, Local authorities, Local authority sector bodies, NGOs, Other and Waste management companies selected the measure. However, there was a low response rate from Manufacturers/producers (11%), Food & drinks manufacturers/producers (0%), Hospitality/retailers (28%) and Trade bodies (38%). 'Other' received high response rates from Manufacturers/producers (68%), Food & drinks manufacturers/producers (100%), Business services (50%) and Local authority sector bodies (100%).



Table 7: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	Penalties for non-compliance, for example fines	Provision of clear guidance on, scope, obligations, actions etc...	Creation of a scheme administrator/regulator	Provision of independent monitoring	Other	Not answered	Total answered
Manufacturers/producers	11%	95%	89%	89%	68%	2%	19
Food & drinks manufacturers/producers	0%	100%	100%	100%	100%	1%	1
Hospitality/retailers	29%	86%	71%	86%	29%	3%	7
Business services	50%	50%	50%	0%	50%	1%	2
Householder	79%	68%	48%	50%	7%	1%	56
Local authority	91%	91%	100%	91%	18%	0%	11
Local authority sector body	100%	100%	100%	100%	100%	1%	1
NGO	89%	100%	56%	67%	33%	0%	9
Other	85%	85%	77%	77%	8%	1%	13
Trade body	38%	77%	54%	77%	23%	1%	13
Waste management company	100%	100%	50%	50%	0%	0%	2



Respondents who answered ‘Other’ were asked to explain their choice:

31 respondents answered ‘Other’, and 30 left a comment.

There were few common themes found.

4 respondents view national communications and campaigns as important to bring awareness and encourage citizen behavioural change surrounding SUPs.

2 respondents mentioned the need for policy measures to align with future policy, such as PPT, DRS and EPR.

2 respondents mentioned that policy measures should be consistent with legislation in other devolved nations.

2 respondents suggest that investment in sustainable SUP alternatives is important.

Question 36. Who should monitor the impact of the measures? (Single option)

Monitoring the impact of policy measures is important in meeting the legislations aims. Consultees were asked what organisation/s should be responsible in doing so.

DAERA:	27 responses (18%)
The Northern Ireland Environment Agency (NIEA):	26 responses (17%)
An independent organisation (e.g., a charity):	17 responses (11%)
A newly created public body:	23 responses (15%)
The companies affected:	2 responses (1%)
Don't know:	18 responses (12%)
Other:	33 responses (22%)



Figure 33: Who should monitor the impact of the measures? (Single choice)

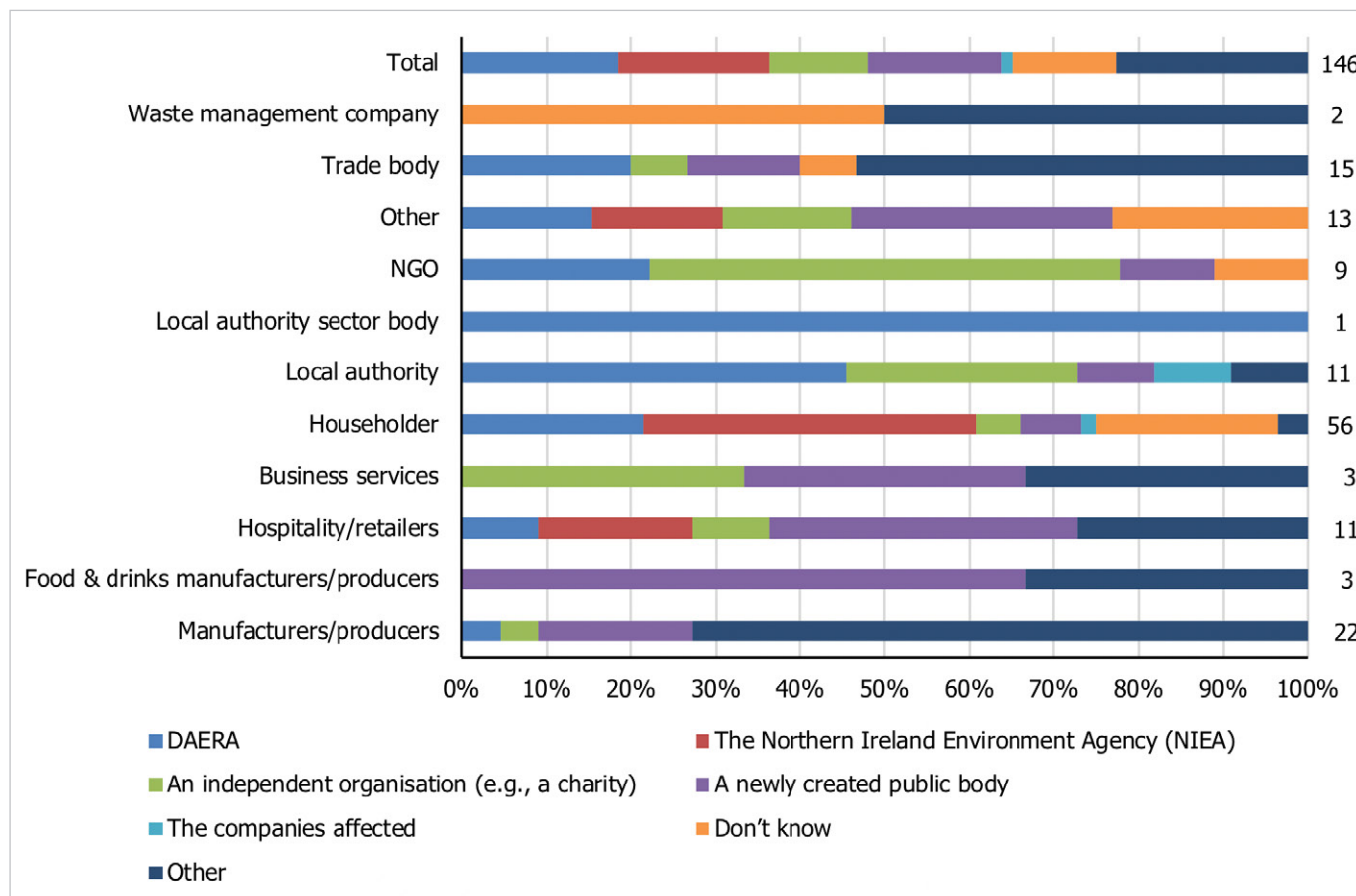


Figure 33 shows the split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not Answered'). Across all respondents, there are mixed responses to this question. 'Other' - detailed below, received the highest response rate, with 22% of respondents. 'DAERA' was favoured by 18% of respondents, whilst the 'The Northern Ireland Environment Agency (NIEA)' was the preferred monitoring body for 17% of respondents. 'A newly created public body' received 15% of responses, this was followed by 'Don't know', with 12% of responses. 'An independent organisation (e.g., a charity)' received the lowest response rate at 11%.

By respondent category there was some variation in response. The majority of Local authorities (45%) and Local authority sector bodies (50%) favoured 'DAERA'. The majority of Householders (39%) preferred 'The Northern Ireland Environment Agency (NIEA)', though Householders were generally split across options. 'An independent organisation (e.g., a charity)' was favoured amongst 56% of NGOs and 25% of Business services. 25% of Business services were also in favour of 'A newly created public body' and 'Other'. The highest response rates for 'A newly created public body' came from Food & drinks manufacturers/producers (67%), Hospitality/retailers (36%) and Other (29%). Though Hospitality/retailers and Other were largely evenly split across the other options. The majority of Manufacturers/producers (73%), Trade bodies (53%) and Waste management companies (50%) selected 'Other'.



Respondents who answered ‘Other’ were asked to explain their choice:

33 respondents answered ‘Other’, 32 left a comment.

21 respondents suggested that ‘DAERA’, ‘The Northern Ireland Environment Agency (NIEA)’ and ‘The companies affected’ should monitor the impact of the measures.

5 respondents favour the appointed scheme administrator for future EPR policy to monitor the impact of policy measures.

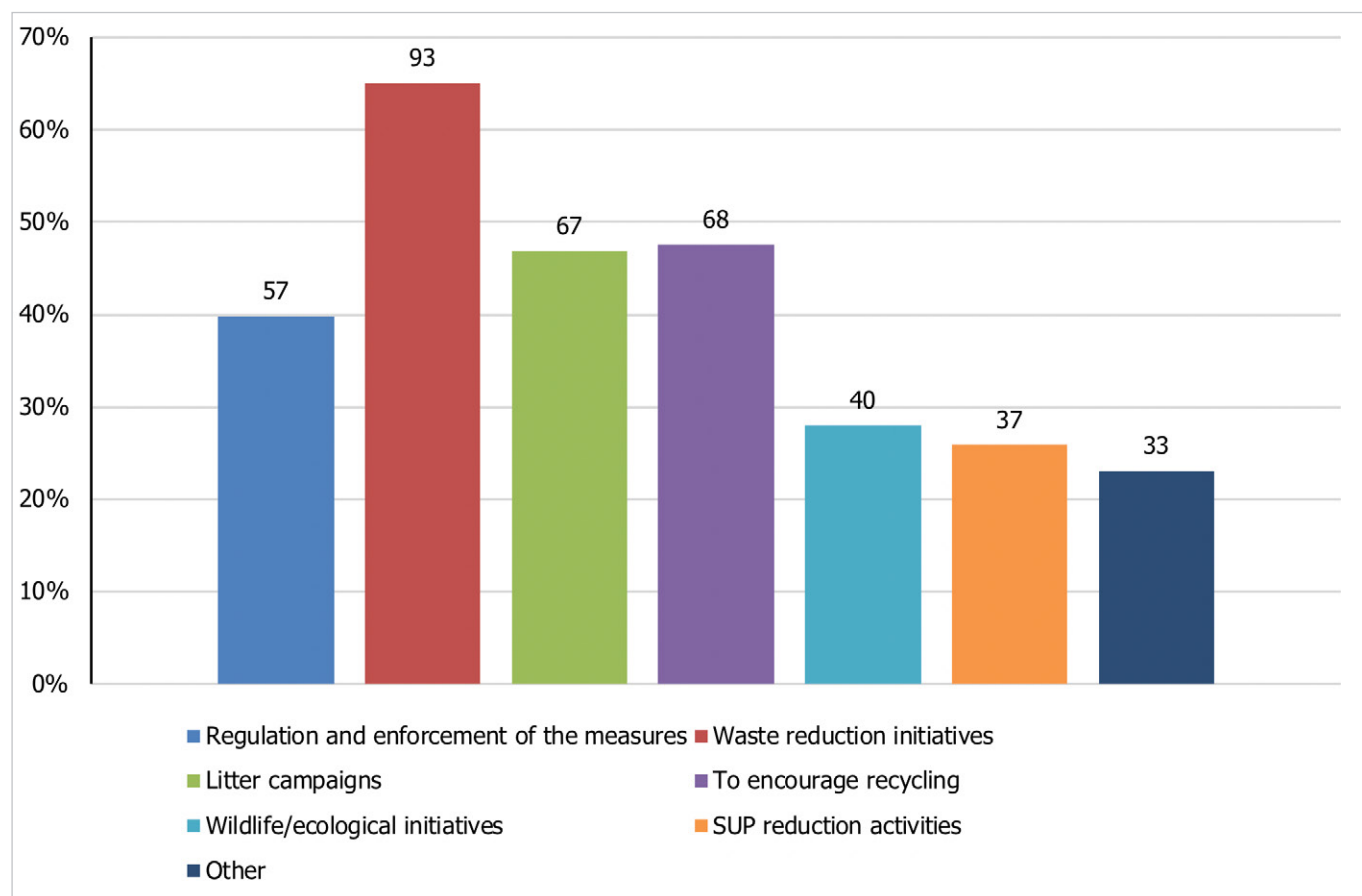
Question 37. If a levy were adopted how should any funds raised from the collection of levies be distributed? (Multiple-choice)

Funds from a levy could be invested in a number of ways to help reduce the consumption of SUP cups and beverages. This question was asked to garner how various stakeholders think funds should be distributed.

Regulation and enforcement of the measures:	57 responses (40%)
Waste reduction initiatives:	93 responses (65%)
Litter campaigns:	67 responses (47%)
To encourage recycling:	68 responses (48%)
Wildlife/ecological initiatives:	40 responses (28%)
SUP reduction activities:	37 responses (26%)
Other:	33 responses (23%)
Not answered:	7 responses (5%)



Figure 34: If a levy were adopted how should any funds raised from the collection of levies be distributed? (Multiple-choice)



Question 37 was a multiple-choice question, respondents were asked to select 3 options. **Figure 34** shows the total number of respondents selecting ways funds from a levy could be distributed and is based only on those who answered (i.e. excludes 'Not Answered'). 'Waste reduction initiatives' received the highest response, at 65% of total respondents. 'To encourage recycling' and 'Litter campaigns' received similar response rates, at 48% and 47% respectively, whilst 'Regulation and enforcement of the measures' received 40% of responses. 'Wildlife/ecological initiatives' and 'SUP reduction activities' received lower response rates, at 28% and 26% respectively. 'Other' received the lowest overall response rate at 23%.

Table 8 shows the percentage split of responses by respondent category and is based only on those who answered (i.e. excludes 'Not answered'). By respondent type, Manufacturers/producers top three preferences for levy funds to be distributed were 'To encourage recycling' (82%), 'Waste reduction initiatives' (73%) and 'Litter campaigns' (67%). For Food & drinks manufacturers/producers, 'Other' (67%) received the highest response rate, followed by 'To encourage recycling', 'Waste reduction initiatives' and 'Litter campaigns', which were all selected by 33% of the category type. 'Other' also received the highest response rate (60%) from Hospitality/retailers. Followed by 'Waste reduction initiatives', 'To encourage recycling' and 'SUP reduction activities', all selected by 40% of the category type. 67% of Business services



favoured 'Other', followed by a 33% split between 'Waste reduction initiatives', 'To encourage recycling' and 'SUP reduction activities'. 'Waste reduction initiatives' received the highest response rate from Householders, followed by 'Regulation and enforcement of the measures' (54%) and 'Wildlife/ecological initiatives' 50%. 91% of Local authorities favoured funds from a levy to be distributed to 'Waste reduction initiatives', followed by 'Regulation and enforcement of the measures' (55%). 45% of Local authorities also favoured 'Litter campaigns' and 'To encourage recycling'. The most popular options amongst Local authority sector bodies were 'To encourage recycling' and 'Other', both with 100%. Other preferred options were 'Regulation and enforcement of the measures', 'Waste reduction initiatives' and 'SUP reduction activities', all selected by 50% of the category type. 'Waste reduction initiatives' were popular amongst NGO's (78%), as well as 'Regulation and enforcement of the measures', 'Litter campaigns' and 'Wildlife/ecological initiatives', all answered by 56% of NGOs. The 'Regulation and enforcement of the measures' was selected by 67% of the Other category type. 'Waste reduction initiatives' (58%) was also popular amongst Other, as well as 'Litter campaigns' and 'SUP reduction activities', both representing 40% of Other's responses. 'Litter campaigns' and 'Other' received the highest response rate (53%) from Trade bodies, followed by 'Waste reduction initiatives' and 'To encourage recycling', with a 47% response rate from the category type. All Waste management companies selected 'Regulation and enforcement of the measures' and 'Litter campaigns'.



Table 8: Percentage by respondent type (Multiple-choice)

PERCENTAGE BY RESPONDENT TYPE	Regulation and enforcement of the measures	Waste reduction initiatives	Litter campaigns	To encourage recycling	Wildlife/ecological initiatives	SUP reduction activities	Other	Not answered	Total answered
Manufacturers/producers	5%	73%	77%	82%	9%	0%	32%	0%	22
Food & drinks manufacturers/producers	0%	33%	33%	33%	0%	0%	67%	0%	3
Hospitality/retailers	20%	40%	20%	40%	0%	40%	60%	1%	10
Business services	0%	33%	0%	33%	0%	33%	67%	1%	3
Householder	54%	72%	41%	43%	50%	28%	6%	2%	54
Local authority	55%	91%	45%	45%	18%	27%	9%	0%	11
Local authority sector body	50%	50%	0%	100%	0%	50%	100%	0%	2
NGO	56%	78%	56%	22%	56%	33%	0%	0%	9
Other	67%	58%	42%	33%	33%	42%	17%	1%	12
Trade body	20%	47%	53%	47%	0%	27%	53%	0%	15
Waste management company	100%	0%	100%	50%	0%	50%	0%	0%	2



8.0 Summary

The consultation for the Reduction of Single-Use Plastic Beverage Cups and Food Containers presented 3 policy options to stakeholders: a ban, a levy and a voluntary scheme, to determine the most effective policy measures to promote the reduction in SUP items. The consultation asked 37 questions on materials in scope, SUP beverage cups, SUP food containers, preferred approach and administration and enforcement. Responses from the consultation were collated, analysed and the results presented in this report.

The results of this consultation will be used to inform future policy decisions in the reduction of Single-Use Plastic beverage cups and food containers. Officials will present the results to the Minister for Agriculture, Environment and Rural Affairs for consideration and direction taking account of developing policy on SUP consumption elsewhere in the UK. A decision on future policy direction for a reduction in the consumption of SUP beverage cups and food containers will be published later in 2022.



9.0 Appendix

9.1 Respondent Categorisation

Manufacturers/producers: 22	Hospitality/retailers: 11
4 Aces Ltd	Asda
Benders Paper Cups	Co-op
Berry Global	Earth Refresh
Bettix Limited	Elior UK
Café Connections Ltd	Henderson Foodservice
Celebration Packaging Limited	JR Marbel Limited The Jolly Fryer
Compresso Cups	McDonald's UK & Ireland
Dart Products Europe	Purple Earth
Dempson Ltd	Vending company
DOpla UK Ltd	Westways Vending Ltd
Dow Europe GmbH - Dow Coatings Materials	Wise Vending Ltd
Euro Packaging UK Ltd	
Faerch UK	Business services: 4
Go-Pak	Colston Consultants Ltd
H20 Direct	CryptoCycle
Huhtamaki	Ecosurety
MM Kotkamills Boards Oy	National Cup Recycling Scheme (Scheme Administrator, Valpak Ltd)
Pactiv Evergeen	
SEDA UK Ltd	Householder: 57
SHARPAK AYLESHAM LTD	
Sovereign Partners Ltd	Local authority: 11
The Printed Cup Company	Ards and North Down Borough Council
	Armagh City, Banbridge & Craigavon Borough Council
	Belfast City Council
	Antrim and Newtownabbey Borough Council
	Fermanagh & Omagh District Council
	Lisburn & Castlereagh City Council
	Mid and East Antrim Borough Council
	Mid Ulster District Council
	Newry Mourne and Down District Council
Food & drinks manufacturers/producers: 3	
Camseng International Foods Limited	
Lavazza	
Selecta	



Local authority sector body: 2
Arc21
Northern Ireland Local Government Association

NGO: 9
County Antrim Countryside Custodians
Fidra
Greyabbey Community Association
Keep Northern Ireland Beautiful
Live Here Love Here
Lough Erne Landscape Partnership
Northern Ireland Environment Link
PlayBoard NI
Sustainable NI

Other: 14
Advisory Committee on Packaging
AFBI
NCWE
NHSCT
Queen's University Belfast
Unnamed (9)

Trade body: 15
Chartered Institution of Wastes Management
Bio-Based and Biodegradable Industries Association
BPIF Cartons
British Retail Consortium
European Vending & Coffee Service Association
Foodservice Packaging Association
Industry Council for Packaging and the Environment
The Federation of Independent Retailers
Northern Ireland Resources Network
Paper Cup Recovery and Recycling Group
RECOUNP
Recycle NI
The British Plastics Federation
The Packaging Federation
The Vending & Automated Retail Association

Waste management company: 2
Bryson Recycling
Re-Gen Waste Ltd

SUP and Waste Legislation Branch
Department of Agriculture, Environment and Rural Affairs (DAERA)
Klondyke Building
Cromac Avenue
Gasworks Business Park
Belfast BT7 2JA

Email: epgni@daera-ni.gov.uk

Web: www.daera-ni.gov.uk