

Advisory Committee on Packaging

Litter Task Force

Report

October 2018

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1. Introduction

The Advisory Committee on Packaging is an independent expert committee which was set up to advise Government on policy for packaging. The Committee agreed to set up a task force group, looking specifically at the role packaging design could play in reducing littering and littering behaviour, originally to report in 2017. This included looking at design aspects such as number of components (e.g. detachable caps) across a range of common items such as plastic drinks bottles, take out meal bags, sandwich packs and confectionery. The Government has committed to carefully consider the Committee's report and encourage the take up of agreed recommendations by packaging manufacturers and designers.

This report summarises the activity, conclusions and recommendations of the Task Force.

1.1. Terms of Reference

Terms of Reference for the work were agreed at the December 2016 ACP meeting:

To consider the role of packaging design in litter and opportunities to reduce the impact.

Although packaging design is the main focus, the task force is also aware that a wide range of issues are relevant to littering. These are covered by other work streams of the Government's litter strategy but may be commented on by the task force to the extent they may overlap with its brief, for example:

- *Consumer behaviour*
- *Education and communications*
- *Facilities*
- *Enforcement*
- *Any other relevant issues*

The Task Force is to consider relevant research reports and information, for example on litter composition and sources, in order to establish the relevant facts on litter.

Outline timescale and milestones

Initial meeting – December 2016

Scoping report – January 2017 ACP meeting

Outline options – April 2017 ACP meeting

Recommendations – July 2017 ACP meeting

Final report – Summer 2018

Task Force Members

A range of industry experts were sought to ensure all aspects of the impact of packaging in litter could be considered with particular emphasis on packaging design.

Adrian Hawkes	- Valpak (Chairman)
David Meehan	- Biffpack

Claire Shrewsbury/Vicky Bennett	- WRAP
Andrew Speck	- HAVI Global Solutions
Durk Reyner	- LARAC
David Bellamy	- FDF
Jane Bickerstaffe/Paul Vanston	- Incpen
Rick Hindley	- Alupro
Martin Kersh	- Foodservice Packaging Association
Kevin Vyse	- Marks and Spencer
Catherine Wilson	- Zero Waste Scotland
Gordon Henmann	- Kingfisher
Rob Holdway	- Giraffe Innovation
Alison Bramfitt	- Nestle

1.2. Task Force Activity

The Task Force held two meetings – December 2016 and March 2017, and a further telephone conference call in October 2017 to assist with compiling this report.

Progress updates summarising the discussions were given to the ACP meetings in April, July and October 2017.

In addition a number of discussions were held with Defra officials during 2017 and 2018 to clarify roles and scope of the ACP work and review progress.

Subsequently Defra commissioned a report in early 2018 from Keep Britain Tidy on packaging design and littering behaviour, to help inform the work of the Task Force. The comments of the Task Force on this report are included in section 6.

2. Initial Findings

The Task Force recognises that packaging design is only one of many factors that can impact on litter. Indeed packaging design alone is likely to be a relatively limited influence when compared with other factors. Having said that it is clear that changes to packaging design can have a positive impact in some situations and these are investigated further in the report. The Task Force considered a number of case studies to illustrate specific aspects and principles of packaging design to help reduce litter. These were:

- Plastic drinks bottles
- Coffee cups
- Take out meal bags
- Sandwich packs
- Confectionery wrappers
- Savoury snacks

This identified potential packaging design factors which could impact litter including:

- Number of separate components, eg. removable bottle caps, tamper evidence devices

- Material tear characteristics for film type wrappers
- Ability to keep items together in a clean outer container, for example for take-out meals and their accompaniments
- The use of prominent anti-litter messages on outer packaging and bags

The Task Force noted that a number of these proposals could be in conflict with other environmental objectives. For example, the ability to keep packaging items together to minimise litter could require additional material and so be in conflict with minimising the use of packaging. A thorough assessment of these trade-offs would be necessary by packaging designers depending on the individual product/packaging circumstances.

The Task Force also considered Local Authority and Waste Industry factors that may make litter more or less difficult to deal with once it had occurred. This aspect was not taken further as the brief was to look at measures to prevent litter occurring rather than deal with it once occurred.

Following further discussion of the interim findings with Defra the Task Force was asked to consider specific proposals and recommendations to put to the Minister.

3. Current Status

The Task Force has completed its activity and developed a set of conclusions and recommendations for consideration by Defra.

4. Conclusions

The Task Force has concluded that:

1. Whilst not the major factor, the design of packaging and packaging components can be a contributory factor to litter.
2. Although the Task Force has indicated some aspects of packaging design which could be factors, it was felt that further technical and design input would be valuable on this subject.
3. There are known to be a number of research papers and articles which may provide useful further information on design aspects such as pack colour and shape which may have secondary impacts on litter, but the Task Force has not had the time to consider these.

5. Recommendations

5.1. Packaging Design Workshop

It was recommended that the ACP run a packaging design workshop event to come up with examples and case studies of packaging formats which will reduce the likelihood of littering, and also to publicise the initiative.

- Consider two parallel work teams, one industry and one of design students
- Brief to be prepared to set out requirements
- Launch presentation attended by ACP representatives
- Judging panel to include both ACP and Defra representatives

To assist in compiling a brief for the workshop, the Task Force would consider any relevant published research on the issue of packaging design and litter.

Note: *This intention behind this recommendation has largely been replaced by the Keep Britain Tidy study separately commissioned by Defra – see section 6.*

5.2. Packaging Design Guide

The Task Force recommends that some basic guidance should be produced to assist packaging designers and specifiers on reducing litterability of packaging. This could include, for example, guidance on the impact of colour, shape, number of components and separability. It could also, where appropriate, refer to relevant use of communication messages relating to litter and the use of digital media and other supporting technologies.

Such guidance is unlikely to merit a separate document, but should be consolidated as a section into other packaging design guides covering aspects such as recyclability and material specification, etc. It is therefore proposed that this be combined with WRAP's work on consistency which includes packaging design for better recyclability.

5.3. Measurement

The Government should establish and maintain a consistent system for recording litter to standard methodology so that progress can be measured and monitored over a number of years.

As a minimum the system should cover number of items, weight and composition.

5.4. Industry Incentives

The Government should investigate opportunities to strengthen both positive and negative incentives for industry to improve packaging design with respect to litter. This could, for example, be achieved through introducing modulated fees into a reformed producer responsibility system for packaging.

5.5. Packaging awards

The organisers of the annual UK Packaging Awards should be approached to consider a category for the best anti-litter design for packaging.

6. Keep Britain Tidy report “Packaging Design and Litter”

To help inform the work of the Task Force, Defra commissioned a research study on packaging design aspects relating to litter from Keep Britain Tidy. This was completed in spring 2018 and the Task Force was asked to comment on the findings and recommendations. These comments are set out below.

6.1. ACP Task Force Comments and Recommendations

The Litter Task Force of the Advisory Committee on Packaging has reviewed the report “Packaging Design and Litter” commissioned from Keep Britain Tidy by Defra. In summary, we believe that the report provides some excellent and helpful insights into the impact of packaging design on litter and that it illustrates some important considerations which could assist packaging designers.

It is clear that packaging design can have an influence on littering, and the report provides some useful examples, but it is thought only ever likely to be a relatively limited influence compared with other factors such as consumption patterns, consumer behaviour, awareness and communications, minimising accidental littering from collection vehicles, lack of convenient disposal facilities, etc, etc. We therefore welcome the Government's placing of any actions to attempt to influence packaging design to reduce littering in the context of the wider Litter Strategy for England, which includes commitments in respect of, for example:

1. Actions to improve education and awareness about litter, including a new national anti-litter communications campaign, and the development by the Foodservice Packaging Association of voluntary code of practice on placing appropriate anti-litter messaging on packaging and at point of sale;
2. Measures to improve the use and effectiveness of enforcement activities against individuals and businesses who choose to ignore regulations and cause litter.
3. Measures to improve the provision of disposal infrastructure, including new guidance for local authorities on 'binrastructure'.

We also welcome the Government's announcement of its intention to publish a Resources and Waste Strategy which we hope will set out a national approach to improve facilities for waste collection and recycling infrastructure, including for "away from home" disposal.

Despite the above, the idea of improving design to, for example, minimise the number of separate components could have a positive impact in some circumstances, and the example of designing tear off strips that stay attached to sachets is a useful illustration of this.

However, there are also some recommendations made by Keep Britain Tidy which, while potentially of some benefit to reducing litter, run the risk of causing other unintended and potentially adverse impacts. For example, designing packaging to increase its "novelty value" might result in increases in the amount of material used and therefore be inconsistent with the Essential Requirements Regulations to keep packaging weight to a minimum. Similarly, deliberately designing in empty space (for built in "bins") would result in an increase in packaging material usage, and therefore also be against the objective of minimising packaging and in contravention of Essential Requirements.

6.2. ACP Conclusions on Keep Britain Tidy study

The Task Force concludes that this report offers some useful insights which could help reduce litter, but anti-litter design considerations must be placed into context with the many other competing priorities that designers face such as:

- Protecting the product
- Minimising material usage
- Being attractive and functional to use
- Communicating essential information to the consumer

In conclusion, the Task Force recommends that, as part of its overall Litter Strategy, the Government should encourage industry to incorporate consideration of 'litterability' into the design parameters for packaging and point to the Keep Britain Tidy report as a useful reference for options.