

Adapting to Change

Annual Report

2020

REPAK 

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LIST OF ACRONYMS

CCA	Contract Compliance Audits
CEP	Circular Economy Package
CLG	Company Limited by Guarantee
DECC	Department of the Environment, Climate and Communications
DRS	Deposit Return Scheme
EfW	Energy from Waste
EPA	Environmental Protection Agency
EPR	Extended Producer Responsibility
ESG	Environmental and Social Governance
HDPE	High-density polyethylene
NNC	Net Necessary Costs
PET	Polyethylene terephthalate
RO's	Recovery Operators
RPS	Repak Payment Scheme
Repak ELT CLG	Repak End of Life Tyres
SUP	Single Use Plastics
SUPD	Single Use Plastics Directive
TFS Office	Transfrontier Shipment Office
WCS	Waste Characterisation Study
WERLAs	Waste Enforcement Regional Lead Authorities

REPAK BOARD MEMBERS 2020



Mr Tony Keohane
Chairperson



Mr Séamus Clancy
Chief Executive Officer



Mr Tom Burke
Elected Brandholder
(appointed 20 February 2020)



Ms Anne Butler
Independent



Ms Edel Clancy
Elected Retailer
(appointed 2 December 2020)



Mr John Curran
Elected Retailer
(retired 7 October 2020)



Mr David Duffy
Elected Distributor / Wholesaler /
Manufacturer / Convertor
(retired 7 October 2020)



Ms Louise English
Independent



Mr William Hanley
Elected Scheduled Member



Mr Joseph Manning
Elected Retailer
(appointed 20 February 2020)



Mr Eoin Mc Donagh
Elected Distributor / Wholesaler /
Manufacturer / Convertor
(appointed 2 December 2020)



Mr James McNeill
Independent



Mr Tom Shipsey
Elected Brandholder

Introduction

2020 was a year of major challenges for our Members, Recovery Operators, and the staff of Repak, in managing through the pandemic. We managed to meet these challenges while delivering on all key compliance objectives and implementing legislative change requirements of the Circular Economy Package (CEP) and the Programme for Government.

In June 2020, Repak applied for and was successful, in receiving approval from Eamon Ryan, TD, Minister for the Environment, Climate and Communications (DECC), to operate as your packaging compliance scheme for a further 5-year period, from January 2021 to December 2025.

Details of the approval conditions are on our website repak.ie and we would encourage all Members to understand the new legal obligations that Repak fulfils on your behalf.

Repak increased its fee income by almost 10% to €32.9m with new Member Income of €1.2m coming from major online and retail producers resulting in a financial surplus of €557k.

Repak provided funding for 1.038m tonnes of packaging recycling & recovery in 2020, a 3% increase on the previous year, with recycling costs increasing by €2.6m (10.6%). The increase in the household sector reflected consumer buying and consumption patterns while the commercial sector saw a reduction in waste generated, particularly in the hospitality sector, which was severely impacted by the pandemic.

The Waste Industry responded exceptionally well to the pandemic conditions, with Ireland being one of the few countries that maintained a full waste recycling service in trying conditions. Repak assisted by providing additional funding to the Industry, when the supply chain for the export of waste paper encountered difficulties in delivering recycling targets.

2020 was also the year when Repak rolled out its pilot Eco Fee Modulation and Net Necessary Cost models in preparation for complying with the requirements of the Circular Economy Legislative Package. The new eco fee modulated structure was communicated to Members and will come into effect on July 1, 2021. In conjunction with the Single Use Plastics Directive (SUPD) legislation, the new eco fee modulated structure signalled Repak is 'Adapting to Change'.

In 2020, all EU recycling targets were achieved. On behalf of our Members, we ensured the most cost effective, efficient delivery of waste packaging recycling and maintained best practice in collection, separation, and repurposing of the packaging you placed on the market.

Repak continues to be one of the best overall recycling performers in Europe with a cost model in the lower quartile of countries. As an agile organisation, with prudent financial management, this places Repak in a strong position to deliver on future environmental challenges.

Introduction

The following summarises how Repak performed for you in 2020:

2020 SUMMARY PERFORMANCE

- **All staff remained Covid-19 free, safe and worked from home.** Covid procedures worked well with a strong staff communication structure in place for teams and individuals, with a programme of engagement that supported esprit de corps. A new HR management system, a new telephone system and additional home working resources were put in place to support the remote working policy.
- **Strong 2020 financial performance.** A surplus of €557k after tax, ahead of budget by €720k. Strong new Member fee income in Q4, with R&R cost managed tightly, overheads significantly lower than budget and a strong financial income recovery in Q4, contributed to the healthy result. In Q4, a Covid -19 fee income credit of €274k was paid to Members whose business had to close in line with Government advice.
- **In 2020, Repak had retained earnings of €28.9m** and closing cash balance including investment funds of €35.8m representing a €0.6m increase on 2019. The Packaging accrual increased to €6.5m.
- **Repak started the year with 3,407 Members** and by year end we had 3,414 alongside another 40-pending payment at year end (3,454). 144 were revoked due to liquidations, consolidations, no longer being obligated or a change of ownership. This represents a satisfying outcome given the challenges of the year.
- **191 New Members joined in 2020** contributing a fee income of €1,158,467.
- **Repak held its first Membership webinar in October 2020.** Over 100 Members registered and joined the presentation, which explained legislative changes required by CEP & SUP and their impact on the collection and treatment of the packaging our Members place on the market. A repeat of the webinar for Members was held in March 2021 with 251 Members joining the online forum.
- **Recycling and recovery of 1.038m tonnes was funded at a cost of €27.2m**, under budget by €180k. The recycling tonnes for 2020 were up by 25,193 (3.7%) on 2019.
- **New EU measurement guidance methodology was adopted by the EPA** for 2018 recycling data. This will have a significant knock on impact on Recycling rates for 2020. Repak is forecasting 2020 Recycling will drop from projected 67% to 63.4%. Likewise, Plastic is expected to drop from 33.8% to 29.3%. All other materials were well ahead of targets with glass achieving an 87% recycling rate, well ahead of the 2030 target of 80%.
- **The Single Use Plastics Directive (SUPD)** and Review of the Packaging & Packaging Waste Directive are major bodies of work which Repak is contributing to and influencing, in the best interest of Members. Significant delays in the issuance of guidance from the EU on the SUPD is proving problematic for both the industry and regulators.
- **Spend on Marketing & Communications was reduced by 33% to €866k** given the challenging environment. We also saw a 92.38% increase in traffic to Repak.ie in 2020 as a consequence of a new digital strategy. Our overall combined public relations activities had a strong reach of 43.4m.
- **Team Green signups continue to build with 19,000 Members**, but fell short of the target of 20,000 by year end. The strategic priorities for 2021 are the B2B and B2C messaging around soft plastic being placed in recycling bins.
- **The 6th annual Pakman Awards ceremony**, powered by Repak, was postponed in 2020 as a full event, due to Covid 19 restrictions. We continued with one Member virtual award, the Plastic Pledge, resulting in 13 entries being shortlisted. Overall Pakman Award winner, Aldi Stores (Ireland) Ltd, alongside Coca Cola HBC Ireland & N.Ireland, Mannok Pack Ltd and Tesco Ireland were awarded Silver while ABP Food Group, Britvic Ireland, Heineken Ireland and Irish Distillers Pernod Ricard were awarded Bronze.

Introduction

At Repak, working with our stakeholders is an integral part of our success. In particular, we wish to thank the Department of the Environment, Climate and Communications (DECC), Local Authorities, Regional Planning Offices, the Waste Enforcement Regional Lead Authorities (WERLAs) and the communications team that manage www.mywaste.ie, for their collaboration in providing consistent recycling communication to consumers.

We also recognise the very important role of our 101 authorised Waste Industry Recovery Operators, who collect packaging from Members, 1.7m household bins, almost 1,900 bottle banks, and 120 civic amenity sites throughout the country. In conjunction with the DECC, the Waste Industry did a tremendous job in maintaining waste services throughout the pandemic. Many operators also upgraded their facilities to improve the quality of recycle and increase capacity in Ireland, which is needed and most welcome, particularly in the area of soft plastics recycling. Without this expertise and commitment to the collection and recycling of our Members packaging, Ireland would not be one of the lead performers in Europe.

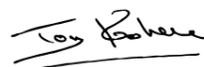
We wish to thank the Board and the sub committees of the Board, for their dedication and support in 2020. Board elections took place as Mr John Curran & Mr David Duffy retired. To these two former Directors, we thank them for their dedication and commitment to their duties over an eight-year period. We also welcome Mr Tom Burke (Elected Brandholder) and Mr Joe Manning (Elected Retailer) who were appointed on 20 February 2020 and Ms Edel Clancy (Elected Retailer) and Mr Eoin McDonagh (Elected Distributor / Wholesaler / Manufacturer / Converter) who were both elected to the Board, and appointed, effective 2 December 2020.

To the staff of Repak a very special thanks in what was a difficult year for all concerned. To everyone that embraced the challenges that Covid-19 brought and delivered a strong outcome for our Members, our sincere thanks.

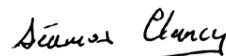
The Board of Repak recognise the major challenges that the Circular Economy Package which includes the introduction of eco fee modulation, net necessary cost and the impact that these will have for Members. The Single Use Plastics Directive has also been reflected in the programme for Government and includes the introduction of a deposit return scheme in Ireland along with significant labelling changes and other measures. Repak will continue to advocate for Members and represent your best interests in the equitable application of these new legislative requirements.

Finally, to you our Members, we thank you for your continued support. We know many will continue to face difficult challenges in 2021 but please be assured we are here to support you. Delivering a packaging compliance scheme on your behalf, that is fit for purpose, and doing so in a cost effective and efficient manner, is our overriding objective.

Assuring you of our best endeavours at all times, on behalf of you, our Members.



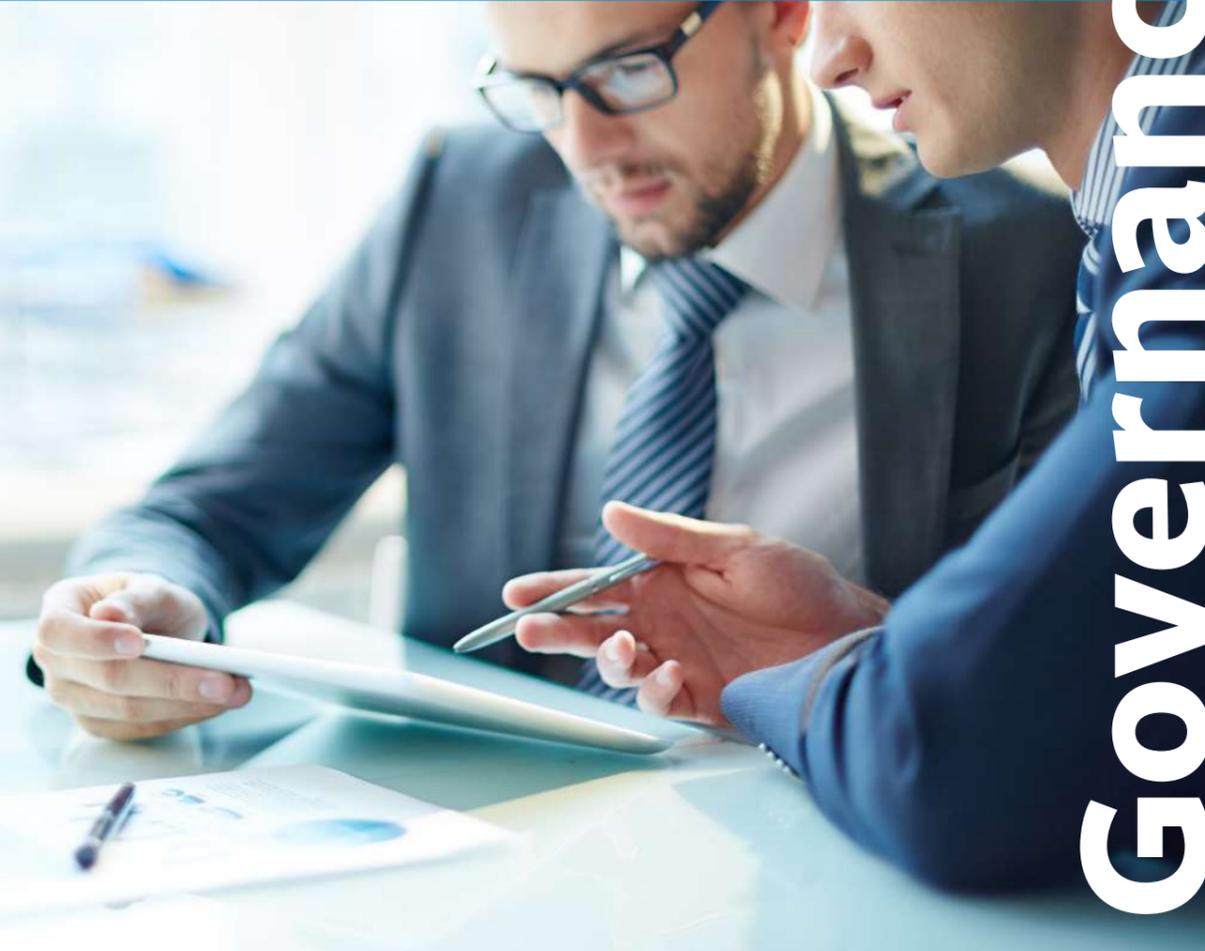
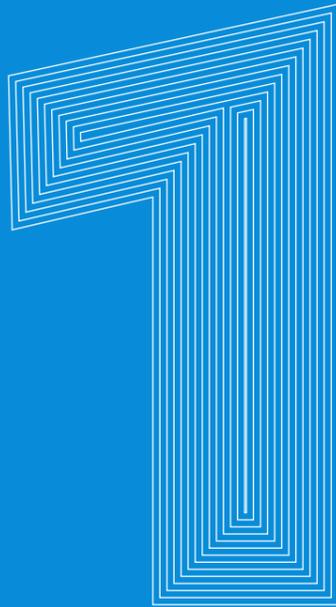
Tony Keohane
Chairperson



Séamus Clancy
Chief Executive Officer



Repak provided funding for 1.038m tonnes of packaging recycling & recovery in 2020, a 3% increase on the previous year, with recycling costs increasing by €2.6m (10.6%).



Governance

01 Governance

The primary corporate governance instruments adopted by Repak are: The Repak Constitution adopted by special resolution on 4 October 2019; the approval from the Department of the Environment, Climate and Communications; and the Terms of Reference for the Committees of the Board.

COMPANY OFFICERS

The following individuals acted as officers of the company during the year ending 31 December 2020.

DIRECTORS

→ **Mr Tony Keohane** Chairperson

→ **Mr Séamus Clancy**
Chief Executive Officer

→ **Mr Tom Burke** Elected Brandholder
(appointed 20 February 2020)

→ **Ms Anne Butler**
Independent

→ **Ms Edel Clancy** Elected Retailer
(appointed 2 December 2020)

→ **Mr John Curran** Elected Retailer
(retired 7 October 2020)

→ **Mr David Duffy** Elected Distributor /
Wholesaler / Manufacturer / Convertor
(retired 7 October 2020)

→ **Ms Louise English**
Independent

→ **Mr William Hanley**
Elected Scheduled Member

→ **Mr Joseph Manning** Elected Retailer
(appointed 20 February 2020)

→ **Mr Eoin Mc Donagh** Elected Distributor /
Wholesaler / Manufacturer / Convertor
(appointed 2 December 2020)

→ **Mr James McNeill** Independent

→ **Mr Tom Shipsey** Elected Brandholder

Repak Is Committed To Best Practice In Corporate Governance.

While recognising the importance of these formal instruments, good corporate governance requires a commitment to, and the practice of, values that guide the company in serving the needs of all its stakeholders. The directors, officers and employees of the company commit to these values.

Board Meeting Attendance 2020

Director	20 Feb	30 Mar	14 May	16 Jun	10 Sep	28 Oct	2 Dec	Attended
Tony Keohane	•	•	•	•	•	•	•	7 of 7
Séamus Clancy	•	•	•	•	•	•	•	7 of 7
Tom Burke	•	•	•	•	•		•	6 of 7
Anne Butler	•	•	•	•	•	•	•	7 of 7
Edel Clancy							•	1 of 1
John Curran	•	•	•	•	•	•	•	7 of 7
David Duffy	•		•	•	•	•	•	6 of 7
Louise English	•	•	•	•	•	•	•	7 of 7
William Hanley	•	•	•	•	•	•	•	7 of 7
Joseph Manning	•		•	•	•	•	•	6 of 7
Eoin Mc Donagh							•	1 of 1
James McNeill	•	•	•	•	•	•	•	7 of 7
Tom Shipsey	•	•	•	•	•	•	•	7 of 7

Company Secretary Mr. Brendan Griffin, Head of Finance

Upon being elected by the Retailer and Distributor / Wholesaler / Manufacturer / Convertor Membership respectively in November, Ms Edel Clancy and Mr Eoin Mc Donagh were appointed to the Board on 2 December 2020.

CORPORATE STRUCTURE**€1.27 each**

The authorised share capital of Repak comprises 10 ordinary shares of €1.27 each

Three ordinary shares have been issued to the following Nominee Companies.

→ **Fand Limited**

→ **Arthur Cox Nominees Limited**

→ **AC Administration Services Limited**

These companies hold the shares under a bare trust agreement on behalf of Repak Members, the beneficial owners of the shares.

The trustee companies undertake to use, vote, transfer etc. in such a manner as directed by the Board of Directors (as representative of the Members) from time to time.

ANNUAL GENERAL MEETING**25 June 2020**

The 2020 Annual General Meeting of Repak was held on Thursday, 25 June 2020.

The meeting was held at Repak Offices, Red Cow Interchange Estate, 1 Ballymount Road, Clondalkin, Dublin 22, D22 HW67. The Annual Reports for Repak are available on www.repak.ie.

REPAK BOARD ELECTIONS**4 years**

Elections to appoint directors to the Repak Board are held every four years.

Repak Members are entitled to vote in elections reflecting their panel of Membership.

Directors are elected from within the following panel of Membership.

→ **Retail - Two Member Directors**

→ **Brandholder - Two Member Directors**

→ **Distributors / Wholesalers / Manufacturers / Convertors - One Member Director**

→ **Scheduled Members - One Member Director**

Elected Directors are appointed for a period of four years, and may seek re-election. No Director may hold office for more than eight years.

**FEES & SUBSIDIES COMMITTEE**

Members (all Directors and the company secretary): Ms Anne Butler (Chairperson), Mr John Curran, Mr William Hanley, Mr Séamus Clancy, Mr Joe Manning, Mr Brendan Griffin.

The Committee makes recommendations to the Board regarding the level of subsidy to be paid in relation to waste packaging materials recovered by Approved Recovery Operators; the level of the annual Membership fee to be paid by Repak Members; the level of fee rebate (if appropriate).

Number of meetings: 3

REMUNERATION COMMITTEE

Members: Mr Tony Keohane (Chairperson), Ms Anne Butler, Mr Joe Manning, Mr James McNeill.

The Remuneration Committee determines and agrees with the Board, the framework and broad policy for the remuneration of the Chief Executive, Chairperson, Directors, senior management and employees.

The Committee is also responsible for benchmarking and reviewing the ongoing appropriateness and relevance of the remuneration policy and company pension scheme.

Number of meetings: 3

STRATEGY COMMITTEE

Members: Mr Tony Keohane (Chairperson), Mr Tom Burke, Mr Séamus Clancy, Ms Louise English.

The Strategy Committee assesses and makes recommendations to the Board on key strategic issues affecting Repak.

Number of meetings: 1

BOARD COMMITTEES**AUDIT & RISK COMMITTEE**

Members (all Directors): Ms Louise English (Chairperson), Mr David Duffy, Mr Tom Shipsey.

The Committee reviews financial and reporting processes in the company. It meets with our statutory auditors and tax advisors PwC. It also monitors investment performance in line with a board approved Statement of Investment Principles.

Number of meetings: 2

NOMINATIONS COMMITTEE

Members (all Directors): Mr Tony Keohane (Chairperson), Mr James McNeill, Mr Séamus Clancy.

The Committee is responsible for identifying and nominating candidates to fill Board vacancies as and when they arise, for the approval of the Board.

Number of meetings: 1

Finance



02 Finance

We are pleased with the overall financial performance in terms of operating surplus and overall surplus, revenue growth and funds returned to Members by means of fee rebates. The outturn for 2020 was positively impacted by revenue arising from new Member recruitment and increased packaging placed on the market by existing Members.

FINACE HIGHLIGHTS 2020

- Surplus after tax of €557k
- Membership fee income of €32.9m net of rebate: Represents growth of 10% driven by new Member recruitment, fee increases reflecting fee modulation and increases in packaging placed on the market by existing Members
- Fee rebates returned to Members in 2020 amounted to €1.04m
- Direct recycling expenditure amounted to €27.2m, reflecting growth in line with tonnes recycled and recovered, alongside increased funding for mixed paper.

REVENUE

Membership fees net of rebate have increased by 10% to €32.9m (2019: €30.0m). The increase arises from a combination of factors, including new Member recruitment, growth in quantities of packaging placed on the market by existing Members and fee increases reflecting fee modulation.

FEE REBATE

In 2020, fee rebates to Members who submitted data and discharged their invoices on time, amounted to €1.04m (2019: €1.3m). Since the inception of the fee rebate programme, Repak has returned €7.59m to Members.

OTHER REVENUE

Repak has recognised other revenue, as defined in a service level agreement, of €673k (2019: €848k) in relation to Repak ELT CLG, a compliance scheme established to recover end of life tyres. The service level agreement includes recharges of payroll and other costs associated with personnel administering the scheme.

DIRECT RECOVERY AND RECYCLING COSTS

Total expenditure of €27.2m (2019: €24.6m) is correlated to growth in tonnes recovered and continued financial support for the recycling and reprocessing of plastic materials - both from the commercial and household sectors. This represents an increase in expenditure of 10.6% in 2020. Direct recovery and recycling expenditure accounted for 83% (2019: 80%) of total expenditure of €32.9m.

Total tonnes recovered increased by 3% to 1,037,782 tonnes (2019: 1,008,130 tonnes). The increase was driven by growth in packaging recycled from householders combined with increases in packaging recovered by waste to energy facilities.

ADMINISTRATIVE EXPENSES

Administrative expenses amounted to €5.7m (2019: €6.1m). Included in this figure is staff costs of €3.0m (2019: €2.8m) as well as marketing, communications and public awareness expenditure of €0.9m (2019: €1.3m).

Repak provided funding for an enforcement programme in partnership with the Department of the Environment, Climate and Communications (DECC), the Waste Enforcement Regional Lead Authorities (WERLAs) and the Local Authorities.

NET INTEREST INCOME

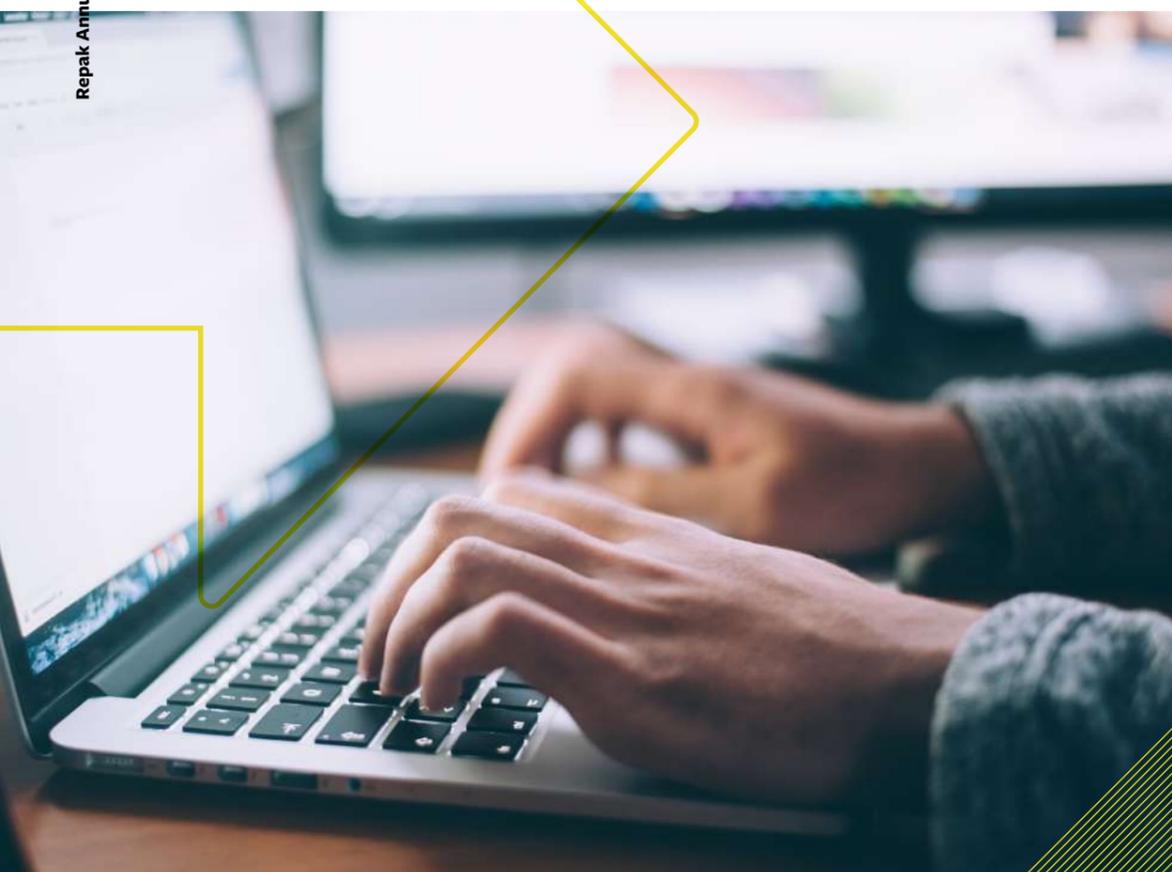
Despite turbulent trading in global financial markets due to the COVID 19 pandemic, the company recorded a small net gain of €17k in relation to investments which were valued at €8.9m at 31 December 2020 (2019: €8.9m).

PROFIT & LOSS ACCOUNT

For the financial year ended 31 December 2020

	2020 €	2019 €
Membership fee income	33,970,431	31,282,988
Membership fee rebate	(1,038,482)	(1,325,762)
Membership fee income net of rebate	32,931,949	29,957,226
Other Revenue	672,954	848,109
Direct Recovery and Recycling costs	(27,186,276)	(24,577,059)
Gross profit	6,418,627	6,228,276
Administrative expenses	(5,693,041)	(6,150,276)
Operating Surplus	725,586	78,000
Surplus on ordinary activities before interest and taxation	725,586	78,000
Interest receivable and similar income	44,546	1,143,747
Interest payable and similar charges	(79,225)	(30,093)
Net Interest (expense) / income	(34,679)	1,113,654
Surplus on ordinary activities before taxation	690,907	1,191,654
Tax on surplus on ordinary activities	(133,526)	(256,590)
Surplus for the financial year	557,381	935,064

There was no other comprehensive income for the financial year.



BALANCE SHEET

As at 31 December 2020

	2020 €	2019 €
Fixed assets		
Tangible assets	2,322,600	2,563,218
Financial assets	8,958,510	8,941,422
	11,281,110	11,504,640
Current assets		
Debtors	2,225,480	1,687,079
Cash at bank and in hand	26,884,083	26,296,741
	29,109,563	27,983,820
Creditors: amounts falling due within one year	(11,256,481)	(10,902,735)
Deferred Tax: amount falling due within one year	(221,977)	(217,823)
	17,631,105	16,863,262
Total assets less current liabilities	28,912,215	28,367,902
Creditors: amounts falling due after one year	—	(13,068)
	28,912,215	28,354,834
Capital and reserves		
Called up share capital – presented as equity	4	4
Profit and loss account	8,912,211	8,354,830
Contingency reserve fund	20,000,000	20,000,000
	28,912,215	28,354,834
Total equity	28,912,215	28,354,834

BALANCE SHEET**FINANCIAL ASSETS**

The company owns two multi asset investment funds. These investments were made with a view to increasing returns having regard to the current negative interest rate environment. They are risk rated low to medium. However, the company is exposed to market risk as there is no capital guarantee associated with these investments. The market value of these investments at year end was €8.9m.

DEBTORS

Included in the debtors' balance of €2.2m are trade debtors of €1.4m (2019: €0.8m) and VAT recoverable of €685k (2019: €614k).

CONTINGENCY RESERVE FUND

As a condition of approval, Repak is required to build up a contingency reserve fund of €20.5m by 2025. Currently, €20m is ring fenced from day to day operations and may only be accessed in limited circumstances with the prior agreement of the Minister.



Total tonnes recovered increased by 3% to 1,037,782 tonnes (2019: 1,008,130 tonnes). The increase was driven by growth in packaging recycled from householders combined with increases in packaging recovered by waste to energy facilities.





03 Membership

Repak's Member numbers remained stable in 2020. At the beginning of the year we had 3,407 Members and this had increased to 3,414 Members by the end of the year. Considering the effect that Covid 19 had on business during 2020, we managed to keep our numbers stable through the efforts of our Recruitment Department. We had 151 new Members certified and a loss of 144 Members through revocations and mergers during the year. This was a net gain of 7 Members into Repak. Of the 3,414 Members in 2020, 34% are Regular Members* and 66% are Scheduled Members*. Fee income from Regular Members accounted for 95% of 2020 fee income, with the remaining 5% coming from Scheduled Members.

A full list of Repak Members may be viewed at www.repak.ie/Members/list.

*See 'Membership Categories' for a description of our Members.

MEMBERSHIP FEES

The Repak fee structure is based on the principle of producer responsibility and is designed to ensure that the cost of recovery of packaging waste is spread on an equitable basis. The key elements of that principle are that responsibility is shared across the supply chain and that producers contribute to national recycling in accordance with the amount and type of packaging they place on the market.

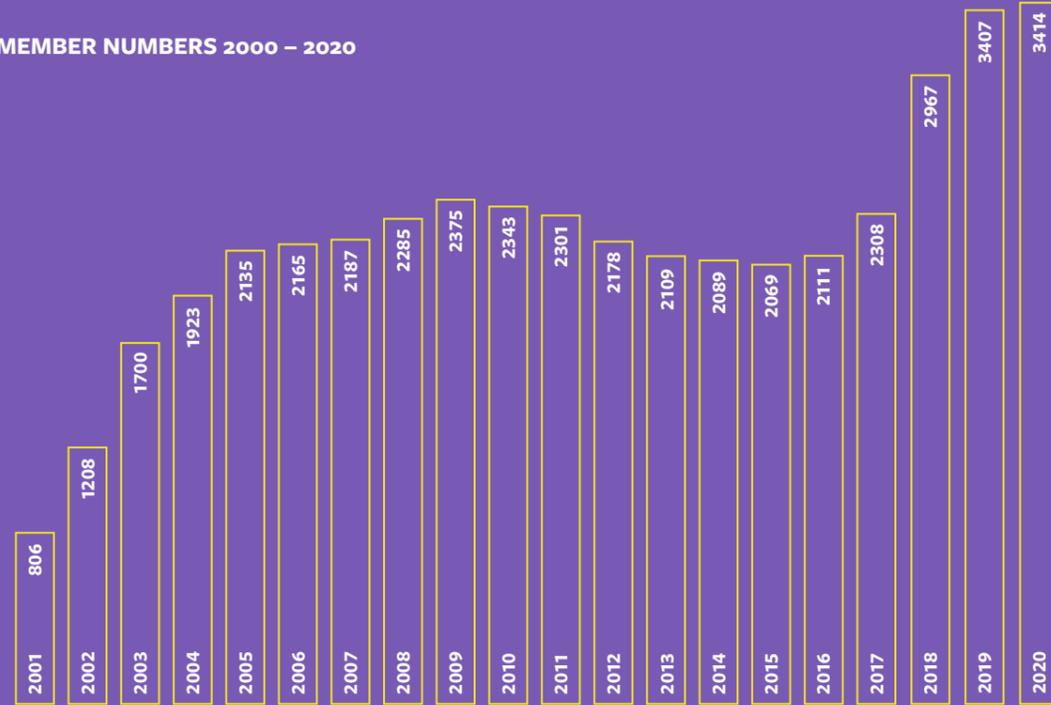
In 2020, the fees for most materials remained the same but the fee for plastics was increased by 15% as a first step in aligning the cost of recycling plastic to the fee charged to producers. This process will continue in 2021 with the fee for recycled plastic being aligned to the net necessary cost of recycling the plastic and the fee for non-recycled plastic increasing substantially. This is to begin the process of aligning non-recycled plastic to the necessary costs of managing it, which is considerably more expensive than recycled plastic. Fees for any composite material will also change to reflect the costs of managing the recycling or otherwise of the material.

MEMBERSHIP FEE REBATE

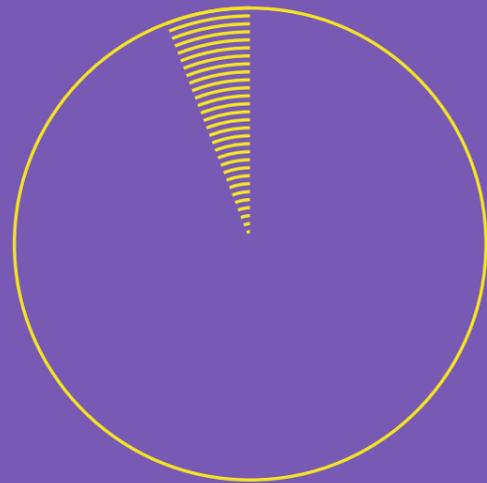
The successful fee rebate programme for Members in place since 2015 continued in 2020. The rebate was subject to a number of qualifying criteria. In total there was €1.038m available for rebate to Members during the year. A total of 561 Regular Members and 1643 Scheduled Members met the required conditions by providing statistical information and paying their fee on time.

While the pressure increases for producers to contribute more to the recycling of packaging, the rebate programme did allow us to repay members up to 5% of their fees in 2020. This assisted Repak to compile the required statistics and collect payments from members on time. A further 5% rebate was approved by the Repak Board for invoices due in January 2021 and the Board will also review in May 2021 a possible rebate for invoice payments due in July 2021.

MEMBER NUMBERS 2000 – 2020

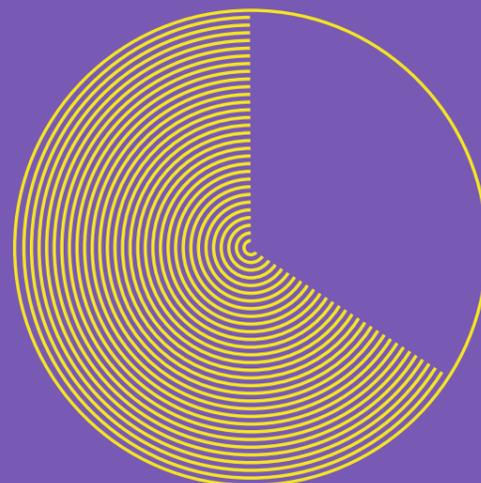


MEMBERS BY INCOME



5% Scheduled 95% Regular

MEMBERS BY NUMBERS



66% Scheduled 34% Regular



PREVENT & SAVE PROGRAMME

Although on site prevention visits were significantly impacted by Covid 19 during 2020, The Prevent & Save Programme continued to support Repak Members large and small, across numerous industry sectors through our packaging optimisation survey programme.

The 2020 programme included the following:

- Continued Member participation in our free onsite packaging optimisation survey programme prior to first lockdown and during periods of eased restrictions
- Support to Members continued during periods of Covid 19 restriction through prevention workshops delivered via Microsoft Teams and other similar video conferencing platforms
- Collaboration with Bord Bia's Origin Green programme also continued during 2020, with numerous Members of both Origin Green and Repak availing of packaging workshops
- Repak's prevention programme was promoted in a number of trade publications such as the Irish Packaging Directory and Food Ireland
- Repak's packaging technology team continued to support the work of the OceanWise Project team. This project is now due for completion in 2021, due to the impact of Covid 19 on the work of numerous partners involved in the project.

PACKAGING DESIGN GUIDE

Fee modulation is a feature of the EU’s Plastic Strategy, and forms part of an effort to drive more manufacturers and retailers to use plastic packaging that can be recycled on their products. In addition, the new Single Use Plastics Directive contains separate collection targets of 77% by 2025 and 90% by 2029 that are specific to plastic beverage bottles.

For Repak, this creates three important issues for how producers of packaging report to us:

1. We must understand and separate plastic packaging placed on the market that can be recycled at present from material that cannot be recycled so that we can apply fee modulation which aims to encourage and incentivise the use of packaging that can be recycled on the Irish market
2. We must understand beverage versus non beverage plastic bottles placed on the Irish market due to the requirements of the Single Use Plastics Directive
3. We also know that in some cases the source of plastic packaging waste is an important factor in whether or not it can be recycled. We must therefore take this into account in our reporting structure.

In addition, Repak aims to support its Members in designing packaging for recycling, and as a result, launched our packaging design guide “Packaging & Design for a Circular Economy” in April 2020.

This guide provides Repak’s Members with information on Repak’s new reporting structure for plastics and composites and includes examples of some of the packaging items in each category.

CATEGORY	GUIDANCE
RECYCLED RIGID PLASTIC	Pots, Tubs, Trays, Crates, Pallets.
RECYCLED FLEXIBLE PLASTIC	Flexible Plastics such as pallet wrap discarded at a business premises.
NON RECYCLED PLASTIC	Flexible plastics discarded at home, toothpaste tubes, foamed polystyrene.
PET BEVERAGE BOTTLES	Soft drinks and water bottles.
OTHER PLASTIC BEVERAGE BOTTLES	Any other beverage bottles not made from PET such as HDPE milk or juice bottles.
PLASTIC NON BEVERAGE BOTTLES	Bottles that are not for beverages such as shampoo or detergent bottles.
RECYCLED COMPOSITES (MAIN MATERIAL <95%)	Beverage cartons and other mixed materials that can be mechanically separated.
NON RECYCLED COMPOSITES (MAIN MATERIAL <95%)	Mostly mixed material laminates such as foil pouches that cannot be mechanically separated.

Source: Packaging & Design for the Circular Economy, <https://repak.ie/members/packaging-optimisation-design/>

The guide also acts as a reference for producers to help them understand how packaging materials are sorted for recycling and how the common packaging materials (paper, metals, plastic and glass) are recycled into new packaging or components.

In addition, it discusses how packaging design can influence the steps in the sorting and recycling processes. The design guide was constructed in consultation with stakeholders from the waste and recycling industries in Ireland and also references some of the latest design guidelines available in Europe.

REPAK MEMBERS’ PLEDGE ON PLASTIC PACKAGING WASTE

The “Repak Members’ Pledge on Plastic Packaging Waste (Plastic Pledge)” was launched in 2018 as part of Repak’s Plastic Packaging Recycling Strategy 2018—2030.

The Plastic Pledge aims to gain commitments from producers to implement changes in their supply chain in relation to plastic packaging, without negatively impacting on food waste.

At the end of 2020, 130 Members of Repak had signed the Plastic Pledge, which included some of the largest producers and retailers in Ireland.



2019 ANNUAL REPORT ON PLASTIC PLEDGE ACHIEVEMENTS AND PLANS

In June 2020, Repak launched the second Plastic Pledge Annual Report, highlighting the achievements of pledge signatories against the 5 Plastic Pledge objectives. This showed that:

- Actions to date, when accumulated, resulted in the reduction or replacement of 16,100 tonnes of plastic packaging
- An average of 14.8% reduction in plastic packaging was reported by Repak’s Plastic Pledge Members as having been completed during 2019
- Over 200 programmes were in progress or completed to make plastic packaging more recyclable.

Our 2020 Plastic Pledge Annual Report will be launched in May 2021.

PLASTIC CHALLENGE WORKING GROUP

Collaboration in relation to the Plastic Pledge objectives continued in 2020 with three meetings and two workshops held on topics including the waste management system and the recycling of plastics, prevention and reuse of plastics and on-package labelling.

Participants from Repak’s membership, the waste industry, local authorities and policy makers all attended these meeting and helped to identify the key actions required. The Government’s Waste Action Plan for a Circular Economy 2020 – 2025 will inform and direct a number of projects. These projects continue to be monitored by the Working Group.

PAKMAN AWARDS

Due to the impact of Covid-19 on businesses in Ireland, the Plastic Pledge Award was the only Pakman Awards category open for entries in 2020.

The category was open to the Plastic Pledge signatories committed to achieving the 5 key objectives relating to reducing plastic packaging and increasing the recyclability of packaging.

A total of 13 businesses were shortlisted in the category, all of whom had a chance of winning a Gold, Silver or Bronze level award for their work to date.

Overall Pakman Award winner, Aldi Stores (Ireland) Ltd, alongside Coca Cola HBC Ireland & N.Ireland, Mannok Pack Ltd and Tesco Ireland were awarded Silver while ABP Food Group, Britvic Ireland, Heineken Ireland and Irish Distillers Pernod Ricard were awarded Bronze.

MEMBERSHIP CATEGORIES

Repak Membership falls into two broad categories — ‘Regular’ and ‘Scheduled’ Membership.

REGULAR MEMBERS

The Repak fee structure for Regular Members is shared across the packaging supply chain (shared responsibility). Members include packaging material manufacturers, packaging converters, brandholders, importers, distributors and retailers. These producers supply twice-yearly packaging statistics and pay fees according to the amount and type of packaging placed on the market. The category also includes producers who are not obligated under the Packaging Regulations but who choose to pay a producer responsibility contribution to the recovery of their packaging.

SCHEDULED MEMBERS

These are producers who retail directly to consumers but who are not brandholders or importers of the products sold on-site. This category includes independent / franchised retailers, licensed premises, off-licences, the hospitality sector, hardware and building materials, pharmacies, electrical retailers and restaurants. Scheduled Members pay a once-yearly Membership fee, based on a schedule of turnover / tonnage bands.

SUMMARY OF MEMBER FEES

Repak Regular Members pay fees on a tonnage basis.

Different packaging materials are charged at individual rates, reflecting the level of subsidy required to ensure that those materials are recovered. The standard fee matrices are shown in Table 1 and Table 2. Table 2 reflects the fee increase due to eco-fee modulation on plastics for the second half of 2021.

Scheduled Members pay a once-yearly Membership fee.

This is based on a schedule of turnover / tonnage bands determined by Repak, in consultation with industry and trade associations and approved by the Board of Repak. The schedule of fees is set out in Table 3.

**TABLE 1** Regular Member Fees per Tonne (Half 1 2021 *)

	Materials Manufacturer	Converter	Distributor	Retailer	Brandholder /Importer
Paper	2.05	2.05	2.05	4.10	22.73
Glass	2.05	2.05	2.05	4.10	9.18
Aluminium	2.05	2.05	2.05	4.10	83.62
Steel	2.05	2.05	2.05	4.10	78.51
Recycled Plastics - Rigid	2.36	2.36	2.36	4.71	102.53
Recycled Plastics - Flexible	2.36	2.36	2.36	4.71	102.53
Non Recycled Plastics	2.36	2.36	2.36	4.71	102.53
Beverage Plastic Bottles - PET	2.36	2.36	2.36	4.71	102.53
Beverage Plastic Bottles - Other Plastic	2.36	2.36	2.36	4.71	102.53
Non Beverage Plastic Bottles	2.36	2.36	2.36	4.71	102.53
Wood	2.05	2.05	2.05	4.10	10.60
Recycled Composite	2.05	2.05	2.05	4.10	75.78
Non Recycled Composite	2.05	2.05	2.05	4.10	111.48

(*) excl. VAT

TABLE 2 Regular Member Fees per Tonne (Half 2 2021 *)

	Materials Manufacturer	Converter	Distributor	Retailer	Brandholder /Importer
Paper	2.05	2.05	2.05	4.10	22.73
Glass	2.05	2.05	2.05	4.10	9.18
Aluminium	2.05	2.05	2.05	4.10	83.62
Steel	2.05	2.05	2.05	4.10	78.51
Recycled Plastics - Rigid	2.42	2.42	2.42	4.83	105.28
Recycled Plastics - Flexible	2.42	2.42	2.42	4.83	105.28
Non Recycled Plastics	2.42	2.42	2.42	4.83	162.91
Beverage Plastic Bottles - PET	2.42	2.42	2.42	4.83	105.28
Beverage Plastic Bottles - Other Plastic	2.42	2.42	2.42	4.83	105.28
Non Beverage Plastic Bottles	2.42	2.42	2.42	4.83	105.28
Wood	2.05	2.05	2.05	4.10	10.60
Recycled Composite	2.42	2.42	2.42	4.83	105.28
Non Recycled Composite	2.42	2.42	2.42	4.83	162.91

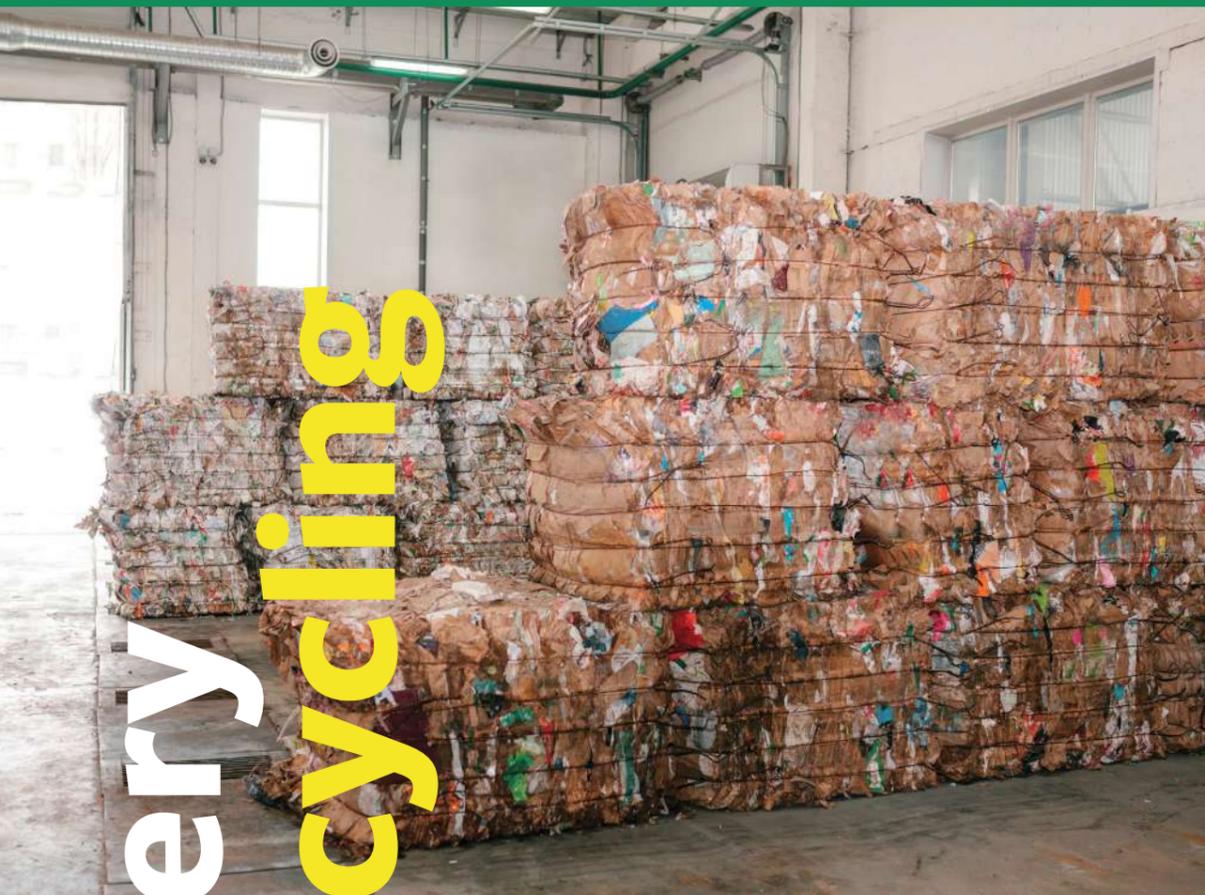
(*) excl. VAT

TABLE 3 Scheduled Member Annual Fees 2021

	Turnover From (€)	Turnover To (€)	Repak Fee (€)
Hardware & Building Materials (between 10t & 25t of packaging)	1,000,000	3,649,999	428.00
Hardware & Building Materials (25t or more of packaging)	3,650,000	Over 3,650,000	1,049.00
Hotel / Hospitality (between 10t & 25t of packaging)	1,000,000	-	428.00
Hotel / Hospitality (25t or more of packaging)	1,000,000	Over 1,000,000	1,049.00
Pharmacy (between 10t & 25t of packaging)	1,000,000	-	428.00
Pharmacy (25t or more of packaging)	1,000,000	Over 1,000,000	1,049
Licensed Premises (between 10t & 25t of packaging)	1,000,000	-	428.00
Licensed Premises (25t or more of packaging)	1,000,000	Over 1,000,000	1,049.00
Independent Retailer (between 10t & 25t of packaging)	1,000,000	-	428.00
Independent Retailer / Off-Licence (25t or more of packaging)	1,000,000	3,809,999	1,049.00
	3,810,000	4,439,999	1,153.00
	4,440,000	5,079,999	1,362.00
	5,080,000	5,719,999	1,572.00
	5,720,000	6,349,999	1,678.00
	6,350,000	6,989,999	1,887.00
	6,990,000	7,619,999	2,097.00
	7,620,000	8,249,999	2,307.00
	8,250,000	8,879,999	2,517.00
	8,880,000	9,519,999	2,622.00
	9,520,000	10,159,999	2,832.00
	10,160,000	10,799,999	2,936.00
	10,800,000	11,429,999	3,146.00
	11,430,000	12,059,999	3,357.00
	12,060,000	12,699,999	3,461.00
	12,700,000	Over 12,700,000	3,671.00
Electrical Retailers (between 10t & 25t of packaging)	1,000,000	3,499,000	428.00
Electrical Retailers (25t or more of packaging)	3,500,000	Over 3,500,000	1,049.00
Restaurant (between 10t & 25t of packaging)	1,000,000	-	428.00
Restaurant (25t or more of packaging)	1,000,000	Over 1,000,000	1,049.00

In total there was €1.038m available for rebate to Members during the year. A total of 561 Regular Members and 1643 Scheduled Members met the required conditions by providing statistical information and paying their fee on time.

Recovery & Recycling



04 Recovery & Recycling

Despite the challenges posed by Covid-19 in 2020, the Waste Packaging Recycling Sector has achieved excellent results across all materials. The industry with the support of Repak, has demonstrated its ability to rise to and overcome unforeseen operational difficulties, including higher generation of packaging waste, particularly in the household and bring bank sectors. Repak's leadership, funding, support and intervention across operations, has ensured that recycling has continued to develop and succeed in Ireland.

KEY INITIATIVES IN 2020

During 2020, Repak, through a number of projects, ensured maximum Recycling and Recovery of packaging waste in Ireland.

These included:

ADDITIONAL FUNDING OF MIXED PAPER RECYCLING

In 2020, Repak provided additional funding of mixed paper recycling due to a significant decrease in prices that continued across the second half of the year. This was mainly driven by changes in international markets and diminished demands due to the onset of economy slowdowns during the pandemic. At an additional €35/tonne, this cumulatively represented an extra €2.1m funding.

GLASS FUNDING

Glass recycling operators faced the greatest challenge in managing volumes that were presented through the Bring Bank system. At times, Operators reported up to an additional 30% in glass generation. Servicing bottle banks through the peak of lockdown was difficult but through Repak's support, services were maintained at a high standard. Additional tonnes collected and processed meant that increased funds of €477k were released by Repak to the glass industry.

WORKING FROM HOME

As businesses and offices closed temporarily, many staff found themselves working remotely. Volumes from the commercial sector were severely reduced. Reciprocally, volumes coming out of the residential sector increased and Repak moved to ensure that savings elsewhere were mobilised to support a new economic reality. Historically, due to the nature of collections in co-mingled bin systems from the household, this sector needed higher levels of support from Repak in a bid to counteract operational costs. In 2020 Repak continued to respond to these needs on behalf of its Members with an additional €3m funding released for household recycling.

COMMUNICATIONS

In 2020, Repak presented two comprehensive Operator Roadshows on 22 and 29 October. These presentations updated Repak's partner Operators on a number of areas including Legislation, Contracts, Net Necessary Costs and long-term funding commitments. Both Roadshows were very well attended with significant engagement through question-and-answer sessions.

NET NECESSARY COSTS (NNC)

Following a successful collation of Net Necessary Costs in 2019, Recovery Operators were introduced to NNC on a more sophisticated scale, that would be implemented in late 2020 and run across Q1, 2021. This has driven a large communication platform between Repak and partner Operators regarding how NNC are to be used for Eco Fee Modulation, how NNC will bring transparency and further credibility to Ireland's recycling industry and ultimately, how NNC will improve behaviour around use of packaging, deterring the use of difficult to recycle materials permanently.

NATIONAL WASTE CHARACTERISATION STUDIES (WCS) & CONTRACT COMPLIANCE AUDITS (CCA)

Studies on sites including compositional analyses (WCS) and compliance checks in the form of CCA's, were restricted due to Corona Virus infection risks. Repak worked closely with Recovery Operators (RO) to assess these risks and where possible to carry out studies that were most critical in RO that had made significant upgrades to their operation as result of considerable capital investments. Other studies, including some MSW (Municipal Solid Waste)/RDF (Refuse Derived Fuel) Surveys, had to be deferred to 2021.

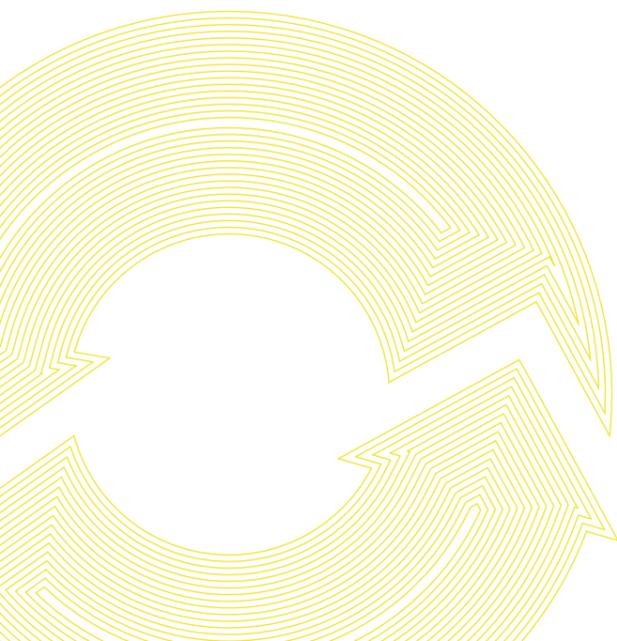
CCA's were successfully carried out remotely following considerable discussion and planning with Operators.

EXPORT TRACEABILITY

In 2020, Repak began a medium to long term strategic project to assess how current traceability processes are working in the context of packaging waste sent abroad for recycling. This project has gained significant momentum throughout the year and has identified that while there is confidence in the data being reported to Repak, not all movements have been reported routinely to Repak. To close data gaps, Repak has made reporting of exportation of packaging waste, a key requirement for it's partner Recovery Operators for the next five years. In 2022, Repak hopes to finalise a reporting mechanism that will continue to support Repak, it's Members, the Recovery Operators and key state agencies like the EPA and TFS office.

2020 KEY PERFORMANCE INDICATORS (TONNES PACKAGING WASTE)

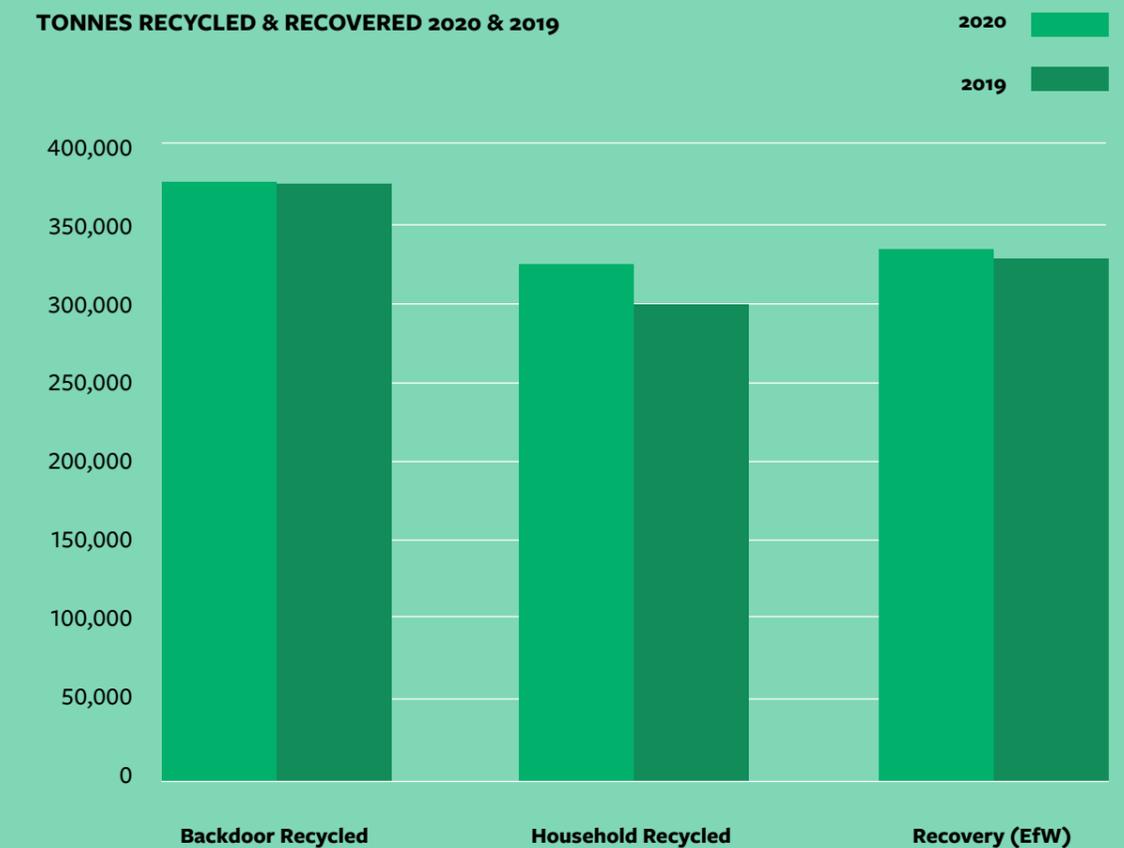
- 1.038m tonnes were funded for Recycling and Recovery in 2020 — a 2.9% increase
- Overall recycling increased by 25k to 703k tonnes (678k tonnes in 2019) — a 3.7% increase
- Backdoor/Commercial recycling was unchanged at 379k tonnes
- Household/Domestic increased by 25k tonnes to 324k tonnes — an 8% increase
- 2020 Recycling 63.4% and Recovery 98%
- Recycling 2020: Glass 87%, Metal 70%, Paper 79%, Plastic 29.3%, Wood 61%.



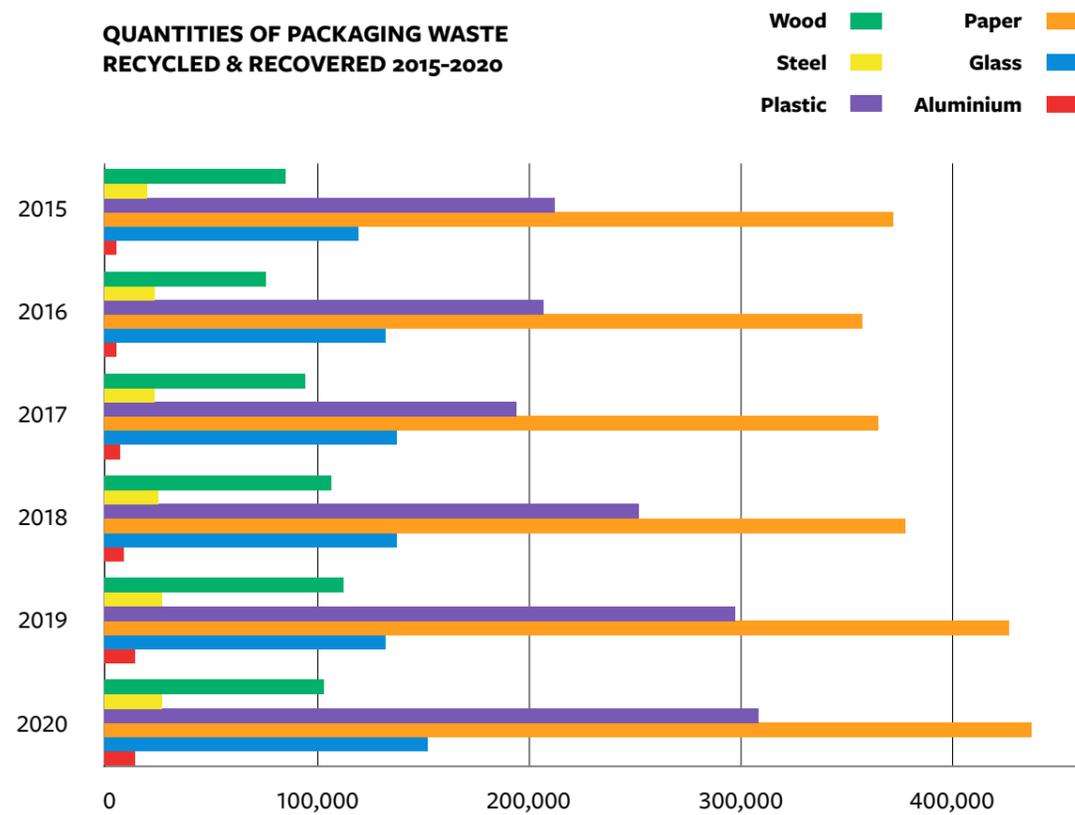
TONNAGE RECYCLED & RECOVERED 2020 V 2019

	2020 (tonnes)	2019 (tonnes)	Increase (tonnes)
Backdoor Recycled	378,764	378,693	71
Household Recycled	324,280	299,158	25,122
Total Recycling	703,044	677,851	25,193
Recovery (EfW)	334,738	330,279	4,459
Totals	1,037,782	1,008,130	29,652

TONNES RECYCLED & RECOVERED 2020 & 2019



QUANTITIES OF PACKAGING WASTE RECYCLED & RECOVERED 2015-2020



2020 KEY PERFORMANCE INDICATORS (FUNDING)

Repak operates and administers an RPS (Repak Payment Scheme) to verify recovery and recycling and to govern funding of packaging waste sourced by Recovery Operators comprised of:

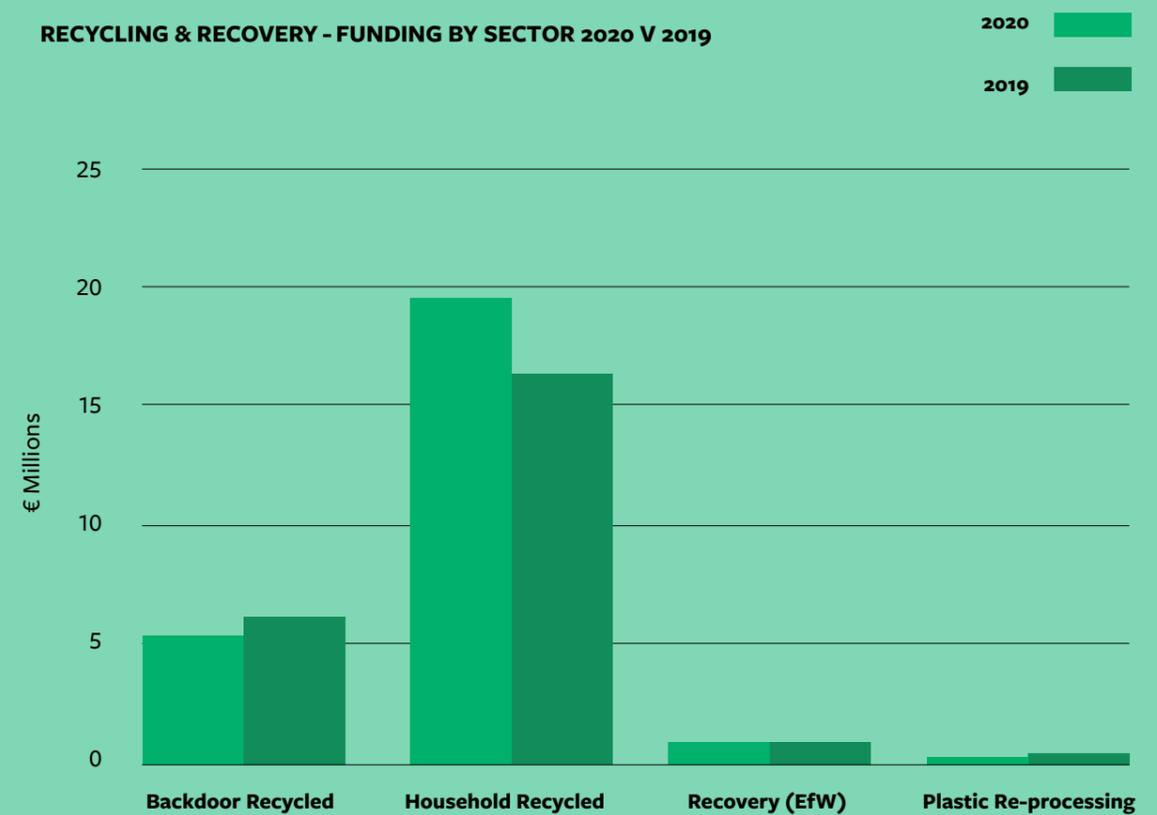
- Backdoor Waste that arises at business premises that has been used to convey goods to the market
- Household Packaging Waste collected through public bring and kerbside collection networks.

In the adjudication and verification of Recovery Operator's performance of the Services in each month during the contract period, Repak makes Subsidy (Funding) Payments to the Recovery Operator, subject to the Recovery Operator's compliance with its obligations.

In 2020:

- €27.2m total funding was invested in Recycling and Recovery
- This was an increase of €2.6m on 2019 (€24.6m) or 10.6%
- 83% of Repak's total annual spend, was on Recovery and Recycling
- Recycling Funding in 2020 was €24.9m, an increase of €2.3m on 2019 (€22.6m) or 10%
- Backdoor/Commercial funding was €5.4m, a decrease of €0.8m or 13%
- Household/Domestic funding was €19.5m, an increase of €3m or 19%
- Recovery funding was €954k, an increase of €12k or 1%
- Plastic Re-processing funding was €407k, a decrease of €150k or 27%.

RECYCLING & RECOVERY - FUNDING BY SECTOR 2020 V 2019

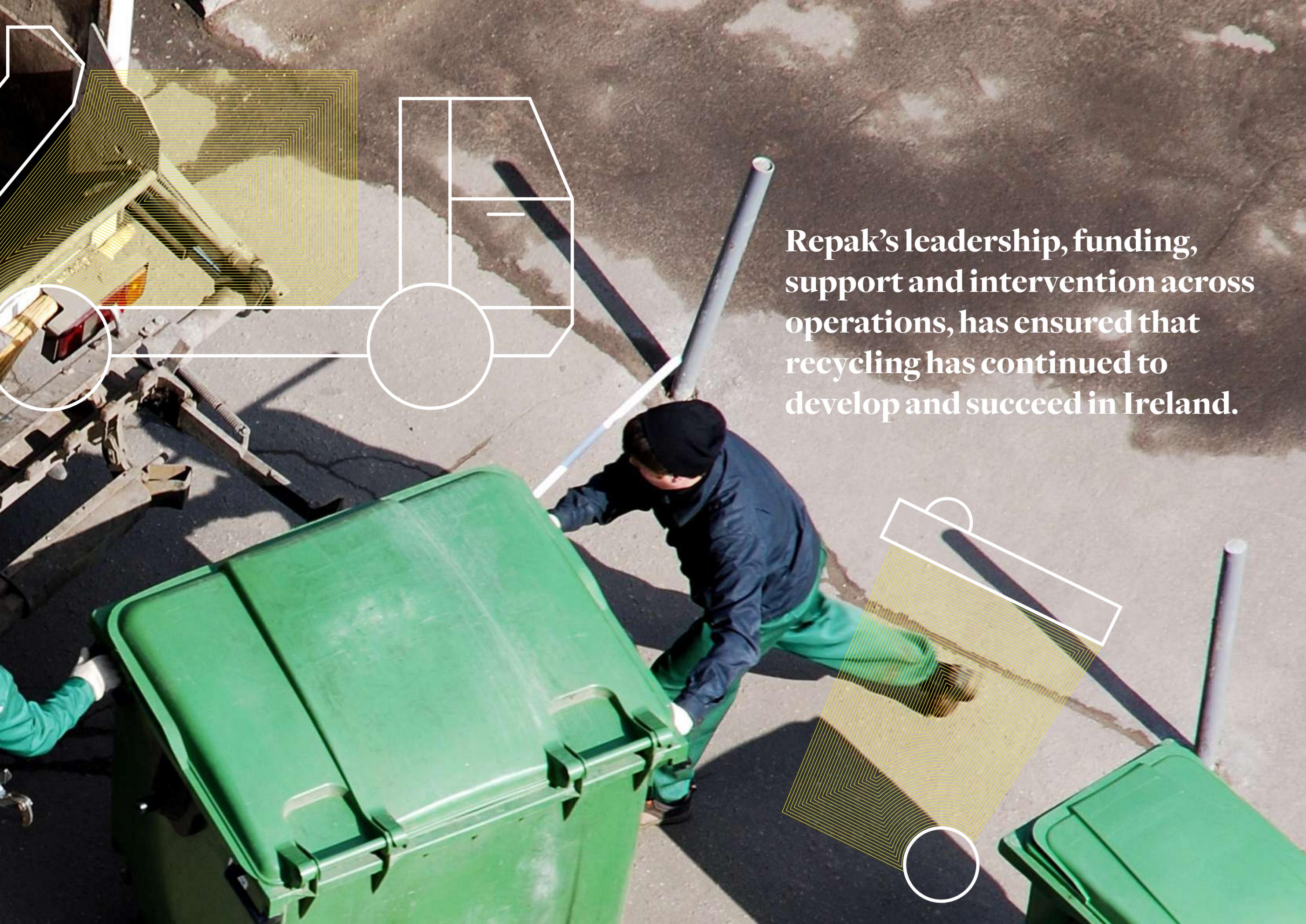


Additional funding for Team Green Bring Banks and Material Specific Trials and Studies in 2020 was €198k and an additional funding amount of €654k was accrued in respect of packaging placed on the market not yet presented at year end for recovery/recycling, bringing total Recycling and Recovery costs to €27.2m in 2020.

COMPLIANCE

In addition to 17 operationally focused Waste Characterisation Studies, Repak completed 30 Contract Compliance Audits remotely, that reviewed Recovery Operator monthly claims and operations including Health & Safety, Financial, Environmental and Insurance compliance. Results from the audits demonstrated full compliance with the Repak Registered Recovery Operators contracts.

Repak also completed over 20 Financial Audits on Recovery Operators. These Recovery Operators cover 90%+ of funding and account for 90%+ of packaging waste tonnes recycled and recovered in 2020. No material issues arose from these audits.



Repak's leadership, funding, support and intervention across operations, has ensured that recycling has continued to develop and succeed in Ireland.



Recruitment & Enforcement

05 Recruitment & Enforcement

The events of 2020 presented numerous challenges to the Repak Sales Team. After a strong start to the year, the Team were forced to re-group and adapt to the new trading conditions after the impact of Covid 19 in March. The Sales Team exceeded the end of year budget and achieved total new income of €1.16m for 2020. Enforcement continues to be an important component in recruiting new business for Repak and ensuring businesses comply with the Packaging Regulations. The working relationship with the Waste Enforcement Regional Lead Authorities & Local Authorities is strong and is an important support mechanism in providing a level playing field for Repak Members.

RECRUITMENT

Quarter 1 2020 was a successful period for the Repak Sales Department with sales of €180,000.

After the global pandemic took hold, this had a significant negative impact on businesses joining Repak from March through to May as uncertainty set in and everyone adapted to the new trading environment. Sales income for this period was only €30,000. The Sales Team used this time to develop new strategies and processes, as well as refocusing their targets towards online retailers and importers who concurrently saw significant increases in sales. Identifying and recruiting these businesses gave the impetus for a strong end to 2020.

Total sales income for 2020 came in at €1,158,467 which exceeded the original budget by 3% and corresponds to 191 new Members. Considering the year it reflected, this was a noteworthy outcome. Regular Membership was the most successful area of recruitment during the pandemic. Businesses recruited included many online retailers: Boohoo, Misguided, Made.com, Johnson and Johnson Visioncare and Otterbox, who embraced their environmental responsibility without the necessity of being legally obliged to do so. These businesses are welcome new Members to Repak, and are setting ESG standards that should encourage others to

follow. Conversely, Scheduled Membership was particularly hit with only 83 new members. In a normal year, this number would be significantly higher and reflects the sectors such as hospitality, that were seriously impacted by the pandemic.

To help support the Sales Team in the recruitment process, a new CRM system was adopted. This has helped build stronger sales pipelines and has supported planning for the short and medium-term. With the development of a new Repak website, Sales took this as an opportunity to refine the online schedule application. Now Scheduled applications are received and processed much more efficiently, hopefully leading to many more new Members in 2021.

ENFORCEMENT

The cooperation between Repak and the Waste Enforcement Regional Lead Authorities (WERLAs) is continuously developing and growing. Communication and information continues to flow between both parties about non-compliant obligated businesses. Importantly, as result of the enforcement pressure applied by Local Authorities, the first successful prosecution for non-compliance with the Regulations in a number of years, occurred in 2020. Further prosecutions of problematic business will following in 2021, which sends a strong message to any business refusing to comply with the Packaging Regulations.

SALES DEPARTMENT 2020

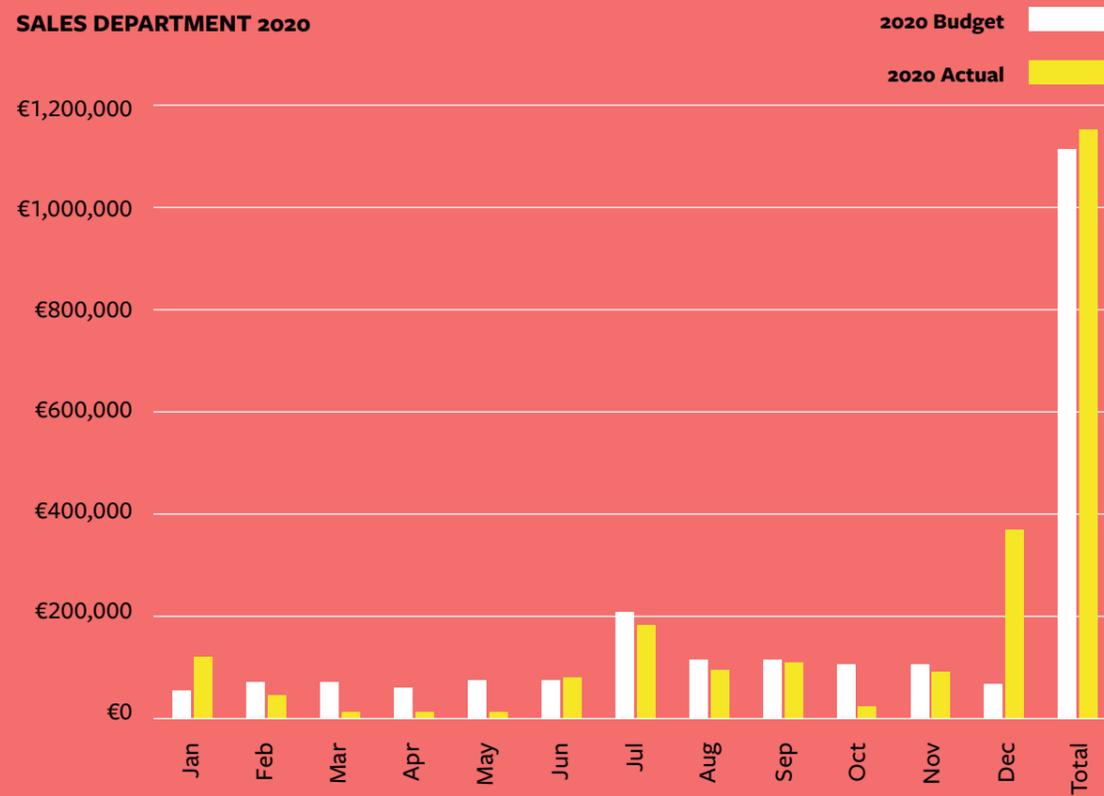
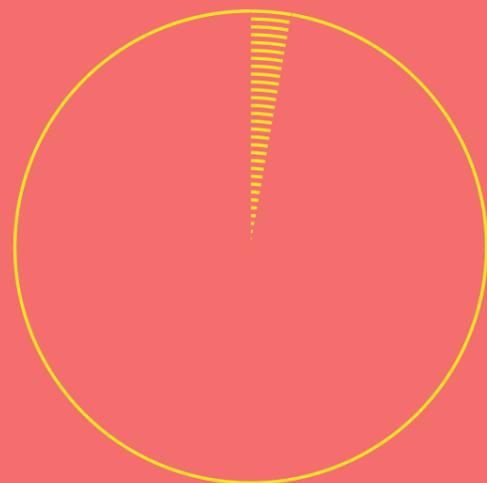
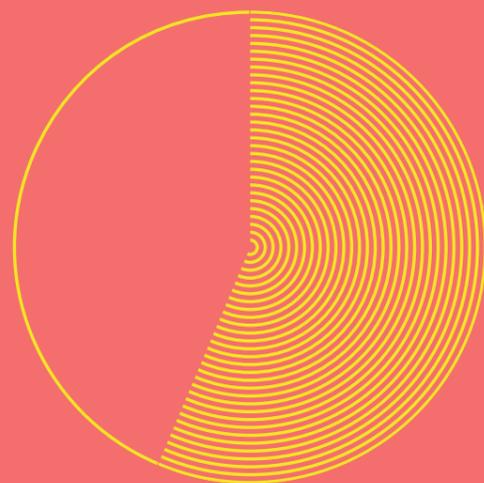


Figure 1
NEW MEMBER REVENUE 2020



⊙ €36k Scheduled
 ○ €1.12m Regular

Figure 2
NEW REPAK MEMBERS 2020



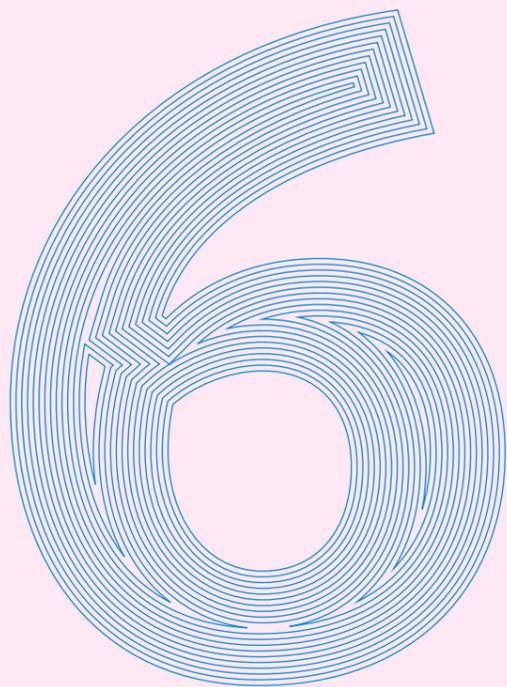
⊙ 108 Scheduled
 ○ 83 Regular



Total sales income for 2020 came in at €1,158,467 which exceeded the original budget by 3% and corresponds to 191 new Members.



Policy Developments



06 Policy Developments

EU POLICY DEVELOPMENTS

1. CIRCULAR ECONOMY ACTION PLAN

In March 2020, the EU Commission adopted a new Circular Economy Action Plan which is one of the main initiatives of the European Green Deal, (i.e. the EU new agenda for sustainable growth).

With measures that address the entire life cycle of products, the new Action Plan aims to make our economy fit for a green future, strengthen our competitiveness while protecting the environment and give new rights to consumers.

Building on the work done since 2015, the new Plan focuses on the design and production for a circular economy, with the aim of ensuring that the resources used are kept in the EU economy for as long as possible. The plan and the initiatives therein will be developed with the close involvement of the business and stakeholder community.

Executive Vice-President for the European Green Deal, Frans Timmermans, said: “To achieve climate neutrality by 2050, to preserve our natural environment, and to strengthen our economic competitiveness, requires a fully circular economy.”

The new Action Plan contains measures to:

- Make sustainable products the norm in the EU
- Empower consumers and public buyers
- Focus on the sectors that use most resources and where the potential for circularity is high such as: electronics and ICT, batteries and vehicles, packaging, plastics, textiles, construction and buildings, food, water and nutrients
- Ensure less waste
- Make circularity work for people, regions and cities
- Lead global efforts on circular economy.

Two areas of relevance to Repak and its Members are the measures on Packaging and Plastics:

Packaging

- The EU Commission intends to propose measures to ensure that the increase in the generation of packaging waste is reversed as a matter of priority, including by setting targets and other waste prevention measures. The amount of materials used for packaging is continuously growing and in 2017, packaging waste in Europe reached 173 kg per inhabitant — the highest level ever
- All packaging placed on the EU market is to be reusable or recyclable in an economically viable way by 2030
- The Commission also proposes to reinforce the mandatory essential requirements for all packaging placed on the EU market.

Plastics

- The Action Plan builds on the 2018 Plastics strategy, and focuses on increasing recycled plastic content, mandatory requirements on recycled content for packaging as required under the Single Use Plastics Directive
- The Action Plan also addresses challenges related to microplastics and sourcing and use of bio-based and biodegradable plastics
- On microplastics, the Commission intends to restrict the intentional addition of microplastics and also introduce harmonised measurement methods, labelling, certification and regulatory measures.

For further details see:

[Circular Economy Action Plan](#)

2. EU BUDGET 2021–2027 & COVID RECOVERY PLAN

One of the most significant events at EU level during the year was the agreement by EU leaders in July on the long-term budget for 2021–2027 and the Covid 19 recovery plan. It was agreed following a long negotiation process and was framed with the aim of ensuring the budget can support the EU’s recovery post Covid. It forms the largest stimulus package ever financed through the EU budget, of €1.8 trillion.

3. PLASTIC OWN RESOURCES

As expected, the Own Resources on plastic packaging is part of the package of EU budgetary measures agreed. This is not a new proposal, as it was first mentioned at the beginning of 2018 by the EU Commission at that time, and has been under consideration since.

The Own Resource provides for the introduction of a levy on non-recycled packaging plastic waste at a rate of € 0.80 per kilogram. It is positioned as a national contribution based on plastic packaging placed on the market that is not recycled

The rationale for this Own Resources tax is twofold:

- It is a revenue generating exercise to raise funds post Brexit
- It is also viewed as an initiative linked to the Circular Economy and the EU Plastics Strategy in that it will create powerful incentives for Member States to reduce the generation of packaging, increase recycling rates and reduce plastic litter which is viewed as a major environmental problem.

The following is an extract from EU Council document:

146. As a first step, a new own resource will be introduced and apply as of 1 January 2021 composed of a share of revenues from a national contribution calculated on the weight of non-recycled plastic packaging waste with a call rate of EUR 0.80 per kilogram with a mechanism to avoid excessively regressive impact on national contributions.

4. PUBLICATION OF 8TH ENVIRONMENT ACTION PROGRAMME (EAP)

In October, the EU published the 8th Environment Action Programme, which will guide European environmental policy from now until 2030. The proposal supports the environmental and climate action objectives of the EU Green Deal and reaffirms the EU’s commitment to a green recovery post Covid.

The 8th EAP proposal calls for active engagement of all stakeholders at all levels of governance, to ensure that EU climate and environment laws are effectively implemented. It forms the EU’s basis for achieving the United Nation’s 2030 Agenda and its Sustainable Development Goals.

For further details see:

8th Environment Action Programme (EAP)

5. SINGLE USE PLASTICS DIRECTIVE (SUPD)

The SUPD is scheduled to be transposed into Irish law in July 2021. However, due to the Covid crisis, there has been a delay at EU level in issuing guidance on various elements of the SUPD such as:

- **Definition of plastics**
- **Litter costs.**

The absence of guidance has created an element of uncertainty and lack of clarity for producers, who are in the process of preparing for implementation of the SUPD, in July 2021. It is expected that the guidance will be issued in Q2 2021.

NATIONAL POLICY DEVELOPMENTS

1. TRANSPOSITION OF THE CIRCULAR ECONOMY WASTE PACKAGE (CEP)

The public consultation process on the transposition of the Circular Economy Waste Package was completed in February. This laid the ground work for the transposition in July, of the following EU Directives into national law:

- **The Waste Framework Directive**
- **The Packaging Directive**
- **The Landfill Directive.**

The directives amended our existing legislation, by setting out additional measures to protect the environment and human health and to facilitate the transition to a circular economy by:

- Reducing the generation of waste
- Improving the management of waste
- Improving the efficiency of resource use
- Increasing our current waste-management targets and introducing new more challenging targets
- Strengthening waste prevention measures
- Introducing new extended producer responsibility obligations
- Clarifying definitions and new data collection and reporting requirements.

2. PUBLICATIONS OF A WASTE ACTION PLAN FOR A CIRCULAR ECONOMY IRELAND’S NATIONAL WASTE POLICY 2020-2025

In September, Eamon Ryan, TD, Minister for the Environment, Climate and Communications, launched the Waste Action Plan for a Circular Economy, Ireland’s National Waste Policy 2020-2025. The Plan has been described as Ireland’s new roadmap for waste planning and management, as the focus is shifted away from waste disposal and looks instead to how we can preserve resources by creating a circular economy. It is rooted in the EU Green Deal, where climate and environmental challenges are converted into opportunities and where resources are kept in use for as long as possible and then recycled or reused at the end of their service life. The Plan is also aligned to the Climate Action Plan.

The Plan was developed as a result of a public consultation process which sought stakeholder views. In addition to assisting with drafting the new plan, the Minister established an Advisory Group of relevant stakeholders from the economic, environmental and social pillars. Initially, the purpose of the Advisory Group was to harness the potential, capacity and creativity of the participants in guiding strategic thinking and decision-making in the preparation of a Waste Action Plan for a Circular Economy. Repak participated in this Advisory Group.

The Plan sets out a range of aims, actions and targets to be achieved, including increased regulation and measures across various waste areas such as Circular Economy, Municipal Waste, Consumer Protection and Citizen Engagement, Plastics and Packaging, and Waste Enforcement.

The key targets under the Waste Action Plan for a Circular Economy of most relevance to Repak Members are:

2.1 PLASTIC, PACKAGING AND SINGLE USE PLASTIC (SUP)

- Deposit and return scheme for plastic bottles and aluminium cans
- Single Use Plastics ban, including cotton bud sticks, cutlery, plates, stirrers, chopsticks, straws, polystyrene cups and SUP food containers and oxo-degradable plastic products from July 2021
- Commitment to ban further products such as (but not limited to) Wet wipes (non-medical); SUP hotel toiletries; SUP sugar/sauce/mayonnaise etc. items
- Reduce number of SUPs placed on the market by 2026.
- Increasing recycled content in plastic bottles

2.2 EXTENDED PRODUCER RESPONSIBILITY (EPR)

- Mandatory EPR for all packaging producers before 2024 EU deadline
- Producers liable for eco modulation of fees
- All packaging reusable or recyclable by 2030.

2.3 ENFORCEMENT

- Expanded role for WERLAs to address priority waste enforcement challenges
- Fixed penalty notices for breaches of waste law.

Plastic, Packaging & Single Use Plastic (SUP)

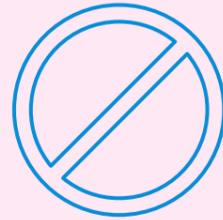
Deposit & Return

Deposit and return scheme for plastic bottles & aluminium cans



July 2021

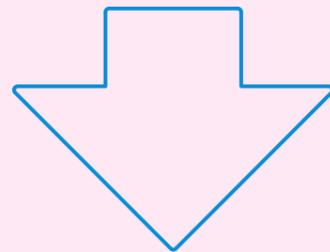
Single use items banned from July 2021:



- Cotton bud sticks
- Cutlery
- Plates
- Stirrers
- Chopsticks
- Straws
- Polystyrene containers & oxo-degradable plastic products.

2026

Significantly reduce SUPs being placed on the market by 2026



2030

All packaging reusable or recyclable by 2030



Extended Producer Responsibility (EPR)

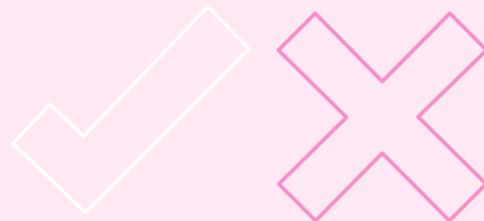
2024 EU Deadline

Mandatory EPR for all packaging producers before 2024 EU deadline



New Rules

New rules for EPR schemes to incentivise good practice in waste recycling & drive better product design



Producers Liable

Producers liable for modulation fees



o6 Policy Developments

A key focus of the Action Plan is on changing the ways in which we produce and consume goods, while preventing and minimising waste and the initial priority is to target those areas which will bring about change in the short term such as; eco-design and fee-modulation, enhanced extended producer responsibility obligations and the introduction of deposit return schemes.

3. DEPOSIT AND RETURN SCHEME (DRS)

In June 2020 the Programme for Government – Our Shared Future – set out the Government’s commitment to introduce a Deposit and Return Scheme (DRS) for plastic bottles and aluminium cans. This was reconfirmed later in the year in the Waste Action Plan for a Circular Economy which included a road map for the delivery of the scheme by Q3 2022.

The first step in the process was launched in October 2020, when the public was asked for their view on the type of DRS that could work in an Irish context.

Alongside the consultation paper, the DECC also published a report it commissioned in 2018 from Eunomia Research and Consulting to analyse options for Ireland to increase the capture of plastic bottles and aluminium beverage containers.

The consultation period closed in November and initial feedback from the DECC is that, there were circa 380 submissions, which indicates a high level of support from the public and other stakeholders in DRS.

Repak made a submission to the public consultation on DRS and engaged with producers and retailers. Feedback indicates that given its knowledge, expertise and track record in extended producer responsibility (EPR), Repak may be the logical choice to manage a new DRS scheme. What is also of relevance here is the ambitious timeframe to plan and launch DRS (i.e. launch date Q3 2022) and the fact that Repak successfully established another EPR scheme for waste tyres in 2017.

The consultation described a number of potential DRS models that could operate in Ireland and posed

a number of questions for consideration. This will feed into the second public consultation on the preferred model and legislative framework for the delivery of DRS. A sub-group of the Waste Advisory Group, has also been formed to assist the DECC in the planning process.

The remaining milestones in establishing a DRS are as follows:

→ Phase 2, Public consultation on preferred model and draft regulations (Q1 2021). This consultation is ongoing and the closing date for submissions is 7 May 2021

→ Commencement of underpinning legislation (Q3 2021)

→ Introduction of scheme (Q3 2022).

4. REPAK’S RENEWAL OF APPROVAL

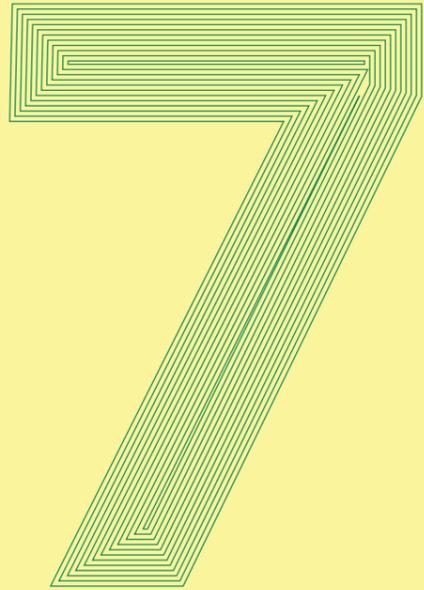
Repak’s Approval to operate a packaging compliance scheme as an Approved Body under Part IV of the European Union (Packaging) Regulations 2014 (S.I. 282 of 2014), expired on 31 December 2020.

Repak successfully applied to the Minister for a renewal of Approval and was granted a new Approval in accordance with Article 19 of the Regulations. The Approval sets out the terms and conditions under which Repak is approved as a packaging waste recovery and recycling scheme in accordance with its application.

This approval covers the period from 1st January 2021 – 31st December 2025 with an interim review to be carried out in 2023.

Repak views this renewal of Approval as an endorsement of its track record and success in providing compliance services to its Members in the area of packaging recovery and recycling since it was first granted Ministerial Approval in 1997.

However Repak is also very much mindful of the significant challenges which lie ahead in embracing change and the transition to a Circular Economy. In this regard Repak is committed to continuous improvement, the prudent management of costs, the enhancement of the collection systems etc., and the continual drive for excellence. It has proven to be an organisation that is agile, flexible and robust and has demonstrated time and again its ability to respond appropriately to its Members needs and to the challenging environment. This will stand Repak in good stead, in playing a lead role in the transformative change set out in the new Programme for Government and the Waste Action Plan for a Circular Economy.



Marketing, Communications & Public Relations



07 Marketing, Communications & Public Relations

In 2020, we continued to support and promote our Members for their sustainability efforts and packaging recycling achievements while building on the success of our education and awareness campaigns. We supported our stakeholders in delivering all EU packaging recycling targets and with many people at home, encouraged the Irish public to continue and improve on their recycling behaviours and recycle their packaging Clean, Dry and Loose.

We continued to drive our marketing and communications with:

Easter, Feed the Heroes, Repak's Team Green, Team Green for Schools, Shop Local and Shop Repak Member this Christmas – while promoting and supporting our Members with the Online Packaging Report, the development of the Plastic Pledge Report, Repak's new Packaging Design Guide and The Pakman Awards. We enhanced our digital and marketing strategy to support communications, deliver significant engagement, measurable results and launched a new online identity for Repak.ie.

Key highlights:

- Repak donates €11,000 to 'Feed the Heroes' initiative
- Over 19,000 individuals have joined Repak's Team Green
- 92.38% increase in traffic to Repak.ie in 2020
- Social Media activity reached over 3 million individuals
- Online Packaging Report campaign had a reach of over 10,851,000 individuals
- Combined PR activity reach at 43,400,000 with a PR value of €1,087,828.66.

PUBLIC ENCOURAGED TO KEEP UP RECYCLING HABITS DURING EASTER

Easter 2020 was a very different year as we stayed at home to help prevent the spread of Covid-19. However, over half (57%) of the Irish public planned to keep up the age-old tradition of buying chocolate eggs as Easter gifts for others.

We used social media and a press release to provide consumers with best practice Easter packaging recycling tips. To support Ireland in reaching its future packaging recycling targets, consumers were encouraged to join Repak's Team Green.

The campaign had a combined reach of over 10 million across social media and print coverage and secured 297 Team Green sign ups.

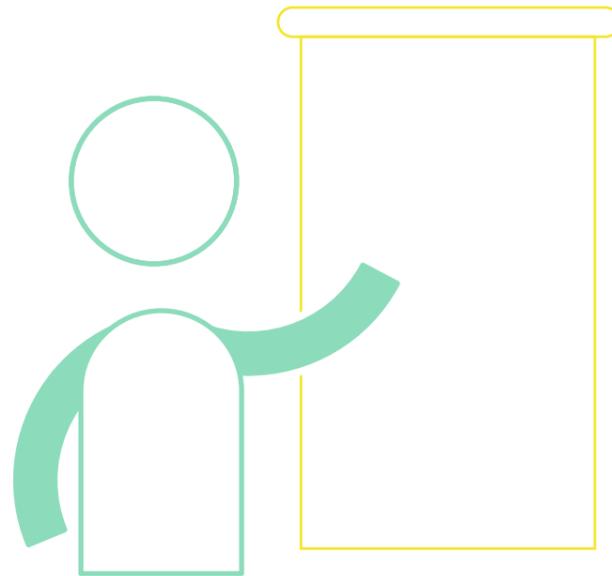
REPAK'S TEAM GREEN DONATES €11,000 TO 'FEED THE HEROES' INITIATIVE

Repak supported the heroic efforts and sacrifices made by Irish frontline health workers by donating €11,000 to 'Feed The Heroes', an initiative which was established as a result of the Covid-19 pandemic.

Feed The Heroes was a grassroots campaign, partnering with restaurants, takeaways, caterers and commercial kitchens to prepare and deliver nutritious meals daily to frontline healthcare workers. Over the 12 weeks of its operation, Feed The Heroes delivered over 200,000 meals to frontline workers nationwide.

From April to June 2020, we pledged to donate €1 to 'Feed The Heroes' on the behalf of every individual who signed up to Repak's Team Green. While the country was in 'lockdown', we focused on promoting recycling education and advice on social media channels Facebook and Instagram, including a 'Can you recycle?' series, offering polls and advice on how to recycle everyday items you would find around the house.

The 'Can You Recycle' series generated 833 additional sign ups to Repak's Team Green, had over 1.7 million impressions including over 138,000 poll responses from the public.



TEAM GREEN FOR SCHOOLS

In 2020 the 'Recycle and Change for the Better' primary school programme was brought under the Repak's Team Green umbrella and is now referred to as 'Team Green for Schools'.

Due to the impact of Covid-19 we moved promotion of the schools campaign to the digital environment and designed communications to engage with teachers through surveys on social media and articles in the INTO 'In Touch' magazine. As Students' homes became the new classroom we ran an interactive colouring competition on social media highlighting the importance of teaching children about best practice recycling tips and created awareness of the programme materials. All programme resources were published to Repak.ie and made available for download. The colouring competition had 30 entries, 813,775 impressions, 3,807 post engagements and 1,533 landing page views.

PLASTIC PLEDGE

Development of the Plastic Pledge grew with another 25 Repak Member signatories to the initiative in 2020, bringing the total to 129.

We launched the 2019 progress report of the Plastic Pledge initiative, which highlights the continued proactive approach that 129 of Ireland's industry leaders are taking to remove avoidable plastics from their business premises and from sale. Our annual Plastic Pledge report monitors and quantifies the efforts of organisations who have signed the pledge, to reduce plastic as part of Ireland's efforts to meet obligations under the European Commission's Circular Economy Package (CEP). We issued a press release detailing key findings from the 2019 Plastic Pledge Report and drove awareness of Repak's new Packaging design guide. Information from the press release appeared in national print, online and regional broadcast. Plastic Pledge PR activity reached over 5 million people with a PR value of €110,927.34. Twenty two pieces of coverage were achieved: Print: 5, Online: 8, Broadcast: 9.

2020 highlights included:

- Introduction of three levels of accreditation under the Plastic Pledge, connected to the Pakman Awards – Gold, Silver and Bronze. Early access to the Pakman Awards website entry platform to facilitate Members entering the awards while submitting content for the 2019 report
- Support for the Plastic Pledge Forum in February, May, September and November 2020
- Programme of structured communication and interaction with Plastic Pledge Members
- Promotion of Plastic Pledge Member initiatives on our digital marketing platforms
- Further development of the Plastic Pledge award category
- A dedicated sign up form that was launched as part of the new website making it easier for Members to join
- Production of the 2019 Report with press release detailing the key achievements of signatories.

PACKAGING MATERIAL FEES BRIEFING WEBINAR

Repak held its first Membership webinar in October. Over 100 Members registered and joined the presentation. The purpose of the webinar was to explain recent legislative changes and their impact on the collection and treatment of packaging our Members place on the market. The webinar explained:

- The background to these changes
- Demonstrated how the costs and fees have been arrived at
- Showed how the statistical data requirements can be completed to meet the new legislative reporting requirements.

The webinar was well received and recorded, making it available to all Members on Repak.ie. Repak will continue to hold additional webinars to engage more Members and educate them of these changes in 2021.





Our Team Green Ambassadors: Anna Geary, Bobby Kerr, Gary & Paul O'Donovan, Paul McGrath & Roz Purcell.

REPAK'S TEAM GREEN CAMPAIGN - DRIVING ENGAGEMENT, BEHAVIOURAL CHANGE AND KEEPING THE PUBLIC IN THE LOOP WITH OUR RECYCLING TIPS

Repak's biggest outreach initiative has grown since its launch in September 2018, with over 19,000 Members, and provides a platform to engage with all stakeholders to help Ireland achieve its packaging recycling targets.

In a time when the country had come together, to achieve a common purpose, the 2020 campaign focused on inspiring the Irish public to join Repak's Team Green and be part of the solution, by committing to ensuring their packaging at home was recycled Clean, Dry and Loose. The campaign, which went live in September, was a fully integrated campaign across all of the marketing mix and included Outdoor Advertising, Spot Radio Advertising, a Newstalk Goes Green Sponsorship package on their broadcast and online channels and Digital which comprised of Video Advertising, Display, Google Search Advertising, The Journal.ie. Social Media, Social Influencers and Public Relations played a key role.

Complying with Covid restrictions to ensure social distancing measures were adhered to, we were granted access to Croke Park, which provided a strong backdrop for the production of the campaign across two days, keeping the messaging of Repak's Team Green through the visual executions.

Team Green outdoor advertising featuring Anna Geary & the O'Donovan Brothers.



Outdoor advertising achieved over 84,000 worth of bonus exposure and ran across commuter routes advertising on bus t-sides and digital placements such as Tesco live boxes reaching an estimated 69% of adults. Using mediums such as social, media, online news partnerships, PPC and display advertising, digital advertising and native content reached over 3 million individuals, with a click-thru rate of 15.2%. Radio advertising consisted of 30-second ads across Irish radio, with 65% of adults hearing the radio ad once and 46% hearing it twice. A partnership with TheJournal.ie achieved 1.40 million impressions and 32,800 native article views. A two week long partnership with Newstalk reached over 377,000 adults and yielded over 2,800 social media engagements.

A substantial focus of the 2020 campaign was the promotion of Team Green Ambassador videos on social media, achieving over 7.4million impressions, 352,000 video views and over 28,000 engagements over a 10 week period. The paid media campaign was also supported by extensive PR activity, with a total PR reach of 8.7 million.

Our Team Green Ambassadors who came on board again this year to promote our key messages included:

- **Anna Geary** – Camogie star, TV presenter and radio broadcaster
- **Bobby Kerr** – Entrepreneur, Broadcaster, former Chairman of Insomnia Coffee Chain
- **Paul McGrath** – Legendary Irish International soccer player
- **The O'Donovan Brothers** – Olympic and World Rowing Championships medal winners
- **Roz Purcell** – Cookery author, social media entrepreneur, founder of the 'Hike Life'

ONLINE PACKAGING PRESS RELEASE

To support our Members and highlight a growing trend of online shopping, we issued an Online Packaging Report Press Release.

In 2020 the Central Statistics Office figures showed that Irish shoppers doubled their online purchases in the first half of the year. The shift in purchasing behaviours was most obvious in April, with online sales increasing by 500% in comparison to the prior year.

To highlight this growing change in behaviour Repak capitalized on issuing a press release to show the impact of online consumer sales on additional packaging in Ireland. The objective of the release was to:

- Call for legislation to be drafted which accounts for the shift towards online shopping. Highlighting a loop hole within the existing legislation that online distance sellers do not have an obligation to be responsible for looking after their packaging in Ireland, therefore leaving Repak Members to contribute to the recycling of their packaging
- Demand non-complaint online businesses be accountable for their packaging – it is unfair, particularly in these trying times
- To show our Members that we are lobbying on their behalf, adding value back to their Repak Membership.

Members were directed to the online packaging press release via email communications. The online packaging press release reached over 10.8 million people and achieved a PR value of €201,603.36. Fifty-six pieces of coverage were achieved: Print: 4, Online: 11, Broadcast: 41.

CHRISTMAS CAMPAIGN – SHOP LOCAL, SHOP REPAK MEMBER

This year's focus for Christmas, under the banner of Repak's Team Green, was to support our Members and in line with government guidelines we encouraged the public to support Irish businesses and 'Shop Local' this Christmas

We ran the campaign across our social media channels which included the use of paid and organic content, utilizing polls and video animations. In addition we encouraged the public to recycle their packaging correctly. The campaign was supported by a press release.

Over 782,000 individuals were reached and 4.69 million impressions achieved across Facebook and Instagram during the campaign. We achieved 212,000 video views and 13,000 poll responses. 77 pieces of coverage from PR reached over 6.7 million people with a value of €157,655.99.



WEBSITE AND DIGITAL MARKETING STRATEGY

The new Repak website went live in May 2020. The website was designed in line with industry best practice to offer an enhanced user experience with improved navigation.

New content and pages were designed to keep both our Members and the public up to date on our latest news and initiatives. In 2020 we saw an increase in traffic of 92.38% to the site with 191,354 users visiting in 2020 vs 99,463 in 2019.

We also developed our new Digital Marketing Strategy for the business reviewing all of our digital platforms in detail and making recommendations which included:

- Development of a content strategy for the business
- Streamlining of YouTube channels
- Review of all social media channels, follower, posting and content strategy
- Review of website performance using Google Analytics, utm links and goals
- Implementation of Google ads to support in driving traffic to Repak.ie
- Review of email marketing and recommendations for a new platform, Newsweaver, which was implemented this January.

PAKMAN AWARDS 2020

The 6th annual Pakman Awards ceremony, powered by Repak, was postponed in 2020 as a full event due to Covid 19 restrictions.

We continued with one Member award, the Plastic Pledge with all 129 signatories to the Plastic Pledge entered into this category, resulting in 13 entries being shortlisted.

We held a virtual ceremony, which took place in Croke Park on the afternoon of the 9 December. Eamon Ryan, TD, Minister for the Environment, Climate and Communications opened the ceremony and Anna Geary acted as MC. This was Repak's first virtual awards ceremony, adapting in the current climate to ensure we continued to keep the Pakman Awards visible in 2020 and add value back to our Members through the event, promoting their achievements.

We ran a digital, social, PR and print campaign as part of this initiative to promote all shortlisted Members, finalists and winners, for their accomplishments.



The Plastic Pledge category was judged under five criteria:

- Efforts of the Plastic Pledge's signatories to prioritise the prevention of plastic packaging waste, minimise avoidable single use packaging and promote packaging reuse where possible
- Efforts of the signatories to support Ireland in delivering the EU's Circular Economy Package plastic recycling targets of 50% of all plastic packaging by 2025 and 55% by 2030
- Efforts to reduce complexity within the plastic packaging supply chain by simplifying polymer usage and eliminating non-recyclable components in all plastic packaging by 2030
- Efforts to help build a circular economy for used plastic packaging in Ireland and Europe by increasing the use of plastic packaging with a recycled content
- Efforts to ensure their approach to plastic packaging reduction is aligned to Ireland's goal of a 50% reduction in food waste by 2030 as set out in Ireland's food waste charter.

Social activity reached over 112,000 people and achieved over 265,000 impressions. We had 67,000 video views across LinkedIn and Twitter. Pakman Plastic Pledge PR activity reached over 159,610 people with a value of €8,468.64.

Pakman Awards 2020 Finalists & Winners



OVERALL PAKMAN AWARD 2020 **Sponsored by Repak**

Aldi Stores (Ireland) Ltd

2020 Plastic Pledge Award Silver Winners

Aldi Stores (Ireland) Ltd
Coca Cola HBC Ireland & N. Ireland
Mannok Pack Ltd
Tesco Ireland Ltd

2020 Plastic Pledge Award Bronze Winners

ABP Food Group Ltd
Britvic Ireland Ltd
Heineken Ireland Ltd
Irish Distillers Pernod Ricard

All 2020 Plastic Pledge Award Finalists

ABP Food Group Ltd
Aldi Stores (Ireland) Ltd
Britvic Ireland Ltd
Brown Thomas Arnotts
Coca Cola HBC Ireland & N. Ireland
Danone Ireland Ltd
Heineken Ireland Ltd
Irish Distillers Pernod Ricard
Lidl Ireland GmbH
National Plastic Packaging Ltd
Mannok Pack Ltd
Suntory Beverage & Food Ireland Ltd
Tesco Ireland Ltd

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