

Repak Member Single Use Plastic Webinar Q&A

Question	Answer
Does a material need to be >50% plastic to be obligated under SUP Regulations?	The Guidelines and Legislation refer to products wholly or partly made from plastic, there are no limits for eligibility. Any SUP items listed in the Annex and made available to the Irish market are obligated.
How does a company that imports SUP items but exports them report?	You will only report for SUP items made available to the Irish Market.
Is this for producers of single use plastics?	It is for producers of single use plastics, as defined under the SUP Regulations i.e. Converters, Importers, or Distance Sellers of single use plastic.
Who can sign the Declaration of Compliance?	The Declaration should be signed by an 'Officer', the definition for an 'Officer' is available on the Declaration of Compliance. Preferably a Director of the company would sign it.
Can you further define the "light plastic carrier bag" as mentioned in the webinar?	Under the Annex and Directive 94/62/EC, lightweight plastic carrier bags refer to plastic carrier bags with a wall thickness below 50 microns.
Is plastic packaging around products included?	Part E1 of the Annex shows the relevant packaging items, for example, pallet wrap does not fall under the SUP Regulations.
Do you have links to the youtube videos on how to fill in the portals?	Yes, training videos are available in the training section on the portal.
I have no idea if this is applicable to my company?	If the plastic products you convert or import are listed in the Annex then you have an obligation and need to submit the relevant data to Repak. If you would like to discuss your business in more detail please contact Repak at sup@repak.ie .
Can you take the required SUP Data from the Packaging submissions already sent in?	This is not possible as the data submitted under your packaging submission includes all plastic packaging whereas under the SUP report we are looking for data on specific items as listed under the Annex, these items can be packaging and non-packaging.
How do you make yourself exempt from SUP on the portal if you are not obligated?	If you do not have an obligation under the SUP Regulations you can send an 'Opt-Out Request' via the portal.

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<p>We don't sell any of the items in the legislation but do report our packaging through the portal, do we still need to opt out?</p>	<p>Yes, all existing members with Repak will have to complete an 'Opt Out Request' via the portal in order to indicate they have no obligation under the SUP Regulations.</p>
<p>Do the recycled content requirements apply to any plastics or only items defined under SUP?</p>	<p>The Regulations apply only to single-use plastic products, listed in Part F of the Annex, made partly or wholly from plastic.</p>
<p>Are retailers or wholesalers that are importing defined as plastic producers?</p>	<p>Yes, if any business directly imports items on the SUP list they will be considered a producer.</p>
<p>Can you please clarify on the position of flexible plastic packaging. Clear film plastic packaging is listed as a single use plastic in this report, but is deemed recyclable under current guidelines.</p>	<p>The Regulations apply to single-use plastic products, listed in the Annex, made partly or wholly from plastic. The recyclability of an SUP item does not determine if it should be reported. Items, listed in the Annex, are packaging and non-packaging items and some would be included on both Packaging and SUP submissions.</p>
<p>What about plastic for medical devices?</p>	<p>Only plastic types outlined in the Annex are obligated at this time.</p>
<p>What is the reporting deadline for 2022 SUP data?</p>	<p>We are asking for the 2022 data to be submitted as soon as our members have the data available. Ideally we would like this data submitted by the end of Q3.</p>
<p>How can I have data for 2022 when I didn't know I needed to collect it?</p>	<p>We understand this may be difficult however we are asking our members to gather the required data as accurately as possible for any of the items listed in the Annex.</p>
<p>Is there an Excel template for the SUP data?</p>	<p>The template for the SUP report is available within the SUP section of the portal.</p>
<p>Where do wet wipes fall under the SUP line category?</p>	<p>Wet wipes have labelling and communications requirements, and must be part of an EPR scheme, but there is separate legislation for wet wipes and will be part of another scheme.</p>
<p>For sanitary towels, are we talking about the weight of the actual towels and pads or the packaging around them?</p>	<p>The SUP Regulations refer to the product, i.e. the towel.</p>
<p>What is the best email to request access the portal for SUP?</p>	<p>You can email sup@repak.ie to request access.</p>

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<p>Are cartons included, even if they only have a very small barrier layer of plastic?</p>	<p>Yes, cartons are included if they have a plastic layer. Any items listed in the Annex are included.</p>
<p>Does a retailer who buys food containers from an Irish supplier have to report also for filled containers sold to consumers or is this covered by the distributor's reporting?</p>	<p>We only look for the data to be submitted by one entity i.e. the converter, the importer or the online seller, therefore if a retailer/distributor is buying all their SUP items from an Irish supplier they will not need to report these items. If, however, a retailer/distributor is importing SUP items, they will need to report these.</p>
<p>When in 2024 is the deadline for the 2023 data?</p>	<p>This has yet to be decided, once a date has been agreed we will communicate this to all obligated producers.</p>
<p>If a company has an EPR requirement but not an SUP requirement do you need to use the new portal or can you continue with the existing one?</p>	<p>SUP reporting is now part of our existing portal. If you need to opt out you can submit this request from the 'Members Details' page within the portal. Once you have opted out you will not have access to the SUP details.</p>
<p>Do company canteens, managed by external catering company, fall under scope</p>	<p>Only producers, as defined under the SUP Regulations, will be obligated i.e. if you import SUP items, listed in the Annex, you will have an obligation but if you source from an Irish supplier you will not have an obligation.</p>
<p>We need to sign the declaration against tethered closures, do we need to add the plastic weight as well?</p>	<p>Repak will not be looking for the information on the tethering of caps (Part C), but the Beverage Containers concerned also need to be part of an EPR scheme (Part E1) and have awareness raising obligations (Part G), so we will need the weights of the beverage containers for these parts.</p>
<p>Is this mandatory or voluntary at this stage?</p>	<p>Any of our members that are deemed a producer under the SUP Regulations have an obligation to submit the SUP report and sign the Declaration of Compliance.</p>
<p>What is the penalty for producers who fail to submit SUP data?</p>	<p>The enforcement body for the SUP Regulations are the Local Authorities. Any companies that are obligated under these Regulations and are not listed on the Repak listing as being in compliance with the Regulations will be subject to audits from the Local Authority and this could lead to possible prosecution.</p>

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<p>What about trays in which meat is packed directly in contact with the meat?</p>	<p>Meat trays, made out of plastic containing packed food that is not intended for immediate consumption, not typically consumed from the food container, and not ready to be consumed without further preparation are excluded.</p>
<p>Please advise or give an indication of the cost per plastic tonne?</p>	<p>Work is being done to assess the costs associated with SUP litter, however, until this work has been completed we cannot advise on the cost associated with the SUP report. As soon as we have visibility on these costs we will be in contact with all SUP producers.</p>