Repak Membership

Repak Membership for Compliance with Packaging Regulations

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About Repak Membership

- Introduction to Repak & EU Regulations

- Membership Benefits & Scheme Rules

- Invoicing, submission dates & fee rebate

Statistical Training for Packaging Returns

- Membership Checklist-Training Report Generated

- Shared Responsibility

- Packaging Terminology

- Guidance on Materials & Back Door packaging waste

- Contract Packing Reporting

- Report Form – Understanding Layout

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Introduction to Repak

Repak was set up in 1997 to help Member businesses meet their legal obligation to recycle the packaging they place on the Irish market. We have over 3,400 Members, whose fees fund household recycling bins, bottle banks, civic amenity sites and business back-door waste nationwide.

88% recyclable

Over the past 20 years, Repak has grown from a 'compliance scheme' to a leading environmental organisation that has helped transform the recycling landscape in Ireland, providing credible knowledge and expertise to many stakeholders on packaging waste, while supporting our Members. For many years, we have challenged our Members to increase the sustainability of their packaging.

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EU Packaging & Packaging Waste Directive

The EU Packaging & Packaging Waste Directive requires the recovery of specified packaging waste, imposing obligations and declaration responsibilities on all Major Producers.

Major Producers are :
* Businesses that have an annual turnover greater than €1m (ex VAT);
* and who place/supply 10 tonnes of Packaging waste or Packaged products on to the Irish market.
* Contract packing contributes towards the 10 tonne threshold.

* A list of Repak Members can be found on our website.

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Benefits of Membership

- **Account Manager**
- **Repak Members' Plastic Pledge**
- **Plastic Strategy 2030**
- **Packaging Design Guide**
- **Back Door Waste Audit**
- **Pakman Awards**
- **Access to a Packaging Technologist**
- **Links to all the above can be found on our Website in our [Members Media Hub](#)**

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Repak Scheme Rules

As part of the Application and Registration Process each member signs and agrees to operate within the Repak Scheme Rules (located on our website).

Key points to Note

- Submission of Data on time,
- Payment of Invoices on time
- Record Keeping (up to 7 Years)
- Subject to Audit by Repak

Repak may revoke a membership account if any of the above are not provided to Repak in line with the membership terms and conditions

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Packaging returns submission dates:

- Half 1 Jan-Jun-(H1) statistics submitted before 21st Aug each year.
- Half 2 Jul-Dec-H2 statistics submitted before 21st Feb of the following year.

2 invoices January (H1) & July (H2)

Half 1 2022 Membership fees are based on Half 1 2021 packaging Data

Payment terms:

30 days from date on invoice

PO numbers or Supplier Set up Forms must be provided if required

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Fee Rebate

Fee Rebates were introduced in 2015 and details are communicated from the membership Department each half year depending on Repak's financial performance.

Regular members qualify for each Rebate by
- Submitting on time
- Paying on time.

The Rebate is paid by Repak to your nominated bank account by SEPA transfer
Bank Details needs to be provided to Repak for this payment to be received.

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Member Statistical Training Guide

Guide on how to complete your Repak Packaging Return

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Your Training Report

Each training session will provide a post training report emailed to all attendees. This report will include notes from discussion outlining:

- Membership Checklist
- Business Activity in the ROI
- Guidance on where you report on a Repak form
- Next Steps to progress a submission for review and approval

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Making your first Repak Return

For New members Joining they will gather data for the previous Calendar year and use the Repak Packaging File provided to complete their first return.

Further support is available to help input data

4-6 weeks from training to submit

Registration and Compliance is only achieved once all data is submitted and invoices are paid. Certificates of Compliance are then issued.

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Shared Responsibility – The Packaging Life-Cycle

The 5 stages of Responsibility

1. Material Manufacturer
   - Makes or imports materials that will be used to make packaging.

2. Converter
   - Makes packaging or imports empty packaging

3. Brandholder / Importer
   - Owns the brand name, applies packaging or imports packaged product.
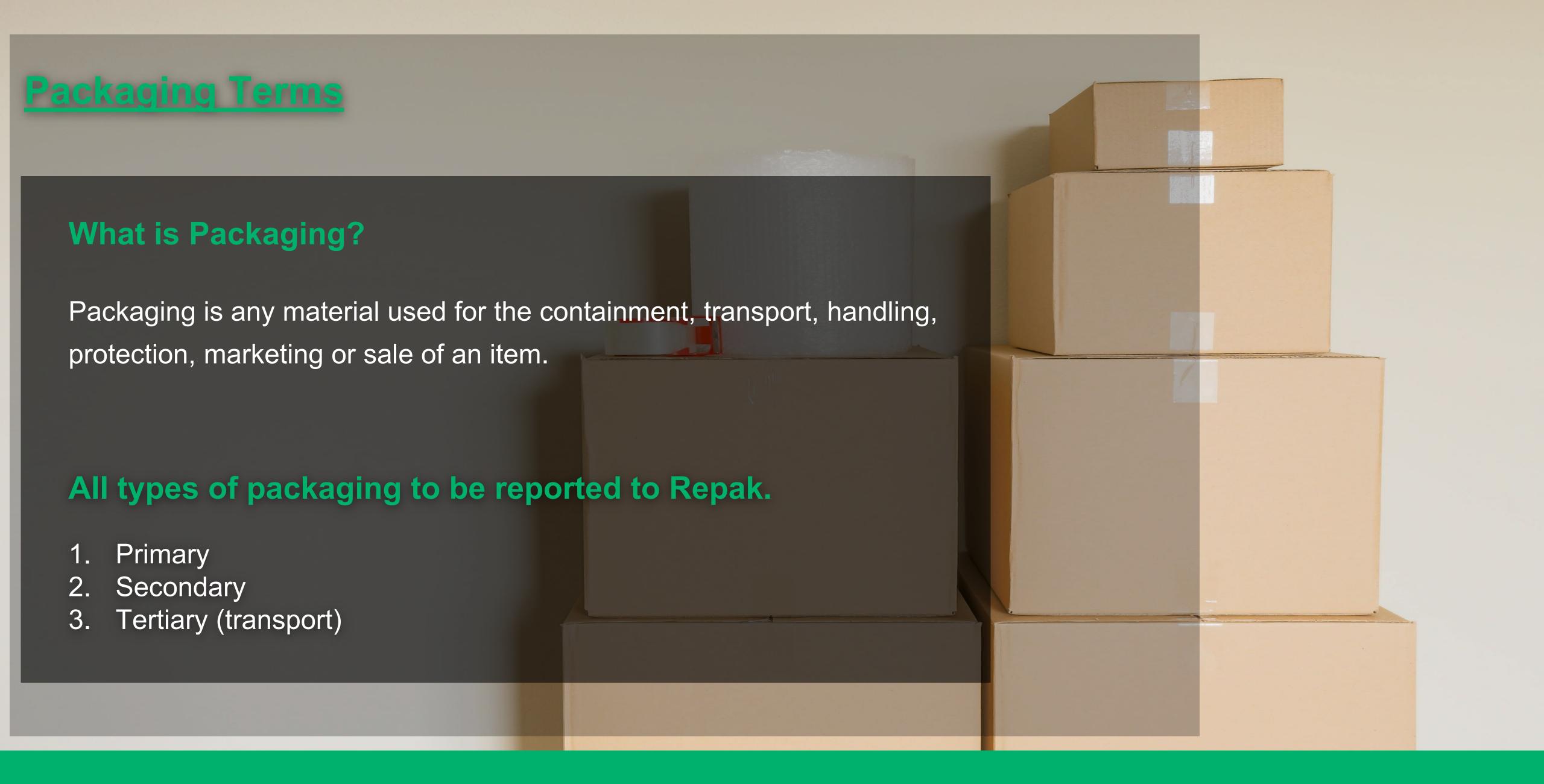
4. Distributor
   - You automatically report as 'Distributor' for all the packaging and packaged product that you report on the Brandholder/Importer line.

5. Retailer
   You are the Retailer for any packaging your customer removes

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Packaging Terms

What is Packaging?

Packaging is any material used for the containment, transport, handling, protection, marketing or sale of an item.

All types of packaging to be reported to Repak.

1. Primary
2. Secondary
3. Tertiary (transport)

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Primary Packaging

This is sales packaging; the packaging that is right next to the product and you often can't sell the product without primary packaging.

Secondary Packaging

This is the packaging that binds a number of primary units together.

Tertiary Packaging

This is the transport packaging used to transport your goods. It is used to protect the goods for shipping.

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Material Types

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Eco Fee Modulation for Packaging

- Eco fee modulation – part of the EU Waste Framework Directive.

- Linked to net cost of waste management and will therefore change depending on these costs.

- The net cost of handling materials that are not recycled is higher than for materials that are.

- This results in higher EPR fees for packaging not recycled payable across Europe to schemes such as Repak.

- Fully rolled out for plastic packaging and in progress for all other packaging materials.

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Materials that can be Recycled in Ireland (excl. Plastics)

Category	Description
Recycled Paper	Non-complex paper and board products. Any coating must be <5% of total material weight and must not hinder standard recycling processes. Examples include cartonboard and corrugated trays and boxes and paper bags.
Recycled Glass	Packaging made from standard packaging glass. Examples include glass beverage bottles, sauce bottles and glass jars.
Recycled Aluminium	Aluminium packaging that can be recycled from either household or commercial premises. Examples include Aluminium trays, cans and bottles.
Recycled Steel	Steel packaging used for non-hazardous products disposed of at both household and commercial premises. Examples include Steel food cans and drums.
Recycled Wood	Wood packaging used in an industrial setting and disposed of at a commercial premises. Examples include wooden crates, boxes and pallets.

Source - '*Packaging & Design for the Circular Economy*' (Recycled = Currently Recycled)

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Materials that are not Recycled in Ireland (excl. Plastic)

Category	Description
Non-Recycled Other**	Non recyclable materials within the categories of Paper / Board, Aluminium, Steel, Glass, Wood and other materials such as textiles (main material must be >95% of pack weight). Examples include - Non recycled paper / board such as coffee cups, siliconized label backing paper and waxed papers. - Soft aluminium tubes, aluminium coffee pods, aerosols. - Steel paint cans, gas canisters. - Non transparent glass, heat resistant glass (borosilicate, Pyrex). - MDF boxes (e.g. for fruit), all wooden packaging disposed of at home. - Other materials (mostly textile such as Hessian, Cotton).

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Plastic Packaging

Plastic reported at the Brandholder/Importer level (sections 1.2 and 2.1 / 2.3) is split
under one of the following sub-categories:

Category	Description
Recycled Rigid Plastic	Rigid three dimensional plastics disposed of at the back door of a business or by the householder. Seen as recyclable when produced using standard packaging plastics. Examples include pots, tubs, trays, plastic pallets and plastic strapping.
Recycled Flexible Plastic	Single polymer films used for packaging applications and that are recyclable. In general, mono material plastics disposed of at the back door or at the household will be seen as recyclable**. Examples include pallet wrap, case shrinkwrap and mono material household soft plastics.
Non Recycled Plastic	Plastic packaging that cannot currently be recycled in Ireland. Examples include expanded / foamed plastics, plastic with layers that change material density, multilayer plastic packaging (particularly where it contains PET-G, PLA, PVC and PS), PVC / PVDC packaging and plastic packaging with PA barrier layers.

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Single Use Plastic (SUP) Directive

The SUP Directive has a number of implications for producers.

- A number of single use plastics were banned in Ireland in July 2021 (plastic straws, cutlery, expanded polystyrene cups and food containers, oxodegradable packaging).

- 77% of plastic beverage bottles (up to 3 Litres) are to be separately collected by 2025 increasing to 90% by 2029.

- PET bottles producers will be required to have 25% Recycled PET in beverage bottles by 2025 and 30% in 2030.

- Caps will need to be tethered to plastic bottles by 2024 as a litter prevention measure.

- There will also be awareness-raising measures and Extended Producer Responsibility (EPR) schemes for single use plastics to contribute to litter clean up cost.

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Plastic Bottle Packaging

Plastic Bottles reported at the Brandholder/Importer level (sections 1.2 and 2.1 / 2.3) is split under one of the following sub-categories:

Category	Description
PET Beverage Bottles	PET Beverage bottles placed on the Irish market are reported. Tonnages reported should also include the label / sleeve and closure.
Other Plastic Beverage Bottles	This category includes plastic beverage bottles not made from PET. Examples include HDPE Milk and Juice bottles.
Plastic Non Beverage Bottles	This includes any plastic bottles not used for beverages. Examples include bottles used for detergent, washing up liquid and shampoo.

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Composite Packaging

Category	Description
Recycled Composites	This category includes mixed materials that are possible to mechanically separate in order to fully or partially recycle them. Examples include one side coated papers and beverage cartons.
Non Recycled Composites	Mixed materials where the materials are not mechanically separable for recycling. Examples include foil pouches, foil sachets and other packaging with over 5% of a secondary material that cannot be separated by standard recycling methods.

Input Packaging

Packaging which is removed from supplied goods or raw materials.

› Reported in Section 1 of the form

Considerations in preparing your report.

Section 1 – Input Packaging

❯ Where does your packaging or packaged goods come from?
- ROI sourced or Imported

❯ Do you have packaging waste arising on your premises i.e. back door packaging waste?

❯ What raw materials do you use?
How are they received/what packaging do you remove?

❯ Do you return any packaging to your suppliers?

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Section 1

Input Packaging

1.1 Irish Sourced Input Packaging

- Supplier/ Invoice is ROI based (Irish VAT applied)

1.2 Imported Input Packaging

- Supplier /invoice is based outside ROI (no Irish VAT applied)

1.3 Internal Packaging Waste Management

- *What happens to this waste /* How is it disposed of?

(1.1 & 1.2 normally equals1.3 unless reporting reuse)

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Packaging Terms

Output Packaging

Empty/Filled packaging that are supplied to your customers.

❯ Reported in Section 2 of the form

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Considerations in preparing your report.

Section 2 – Output Packaging

❯ How do you pack products? What types of packaging do you apply to goods/products?
   - ROI sourced or Imported

❯ Do you sell pre-packaged goods/products?

❯ Does your customer remove packaging and return it to you for reuse?

❯ Do you sell to the end user?

❯ Do you contract pack for a ROI business or does a 3rd party in ROI contract pack for you?

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Section 2

Output Packaging

2.1 Irish Sourced Output Packaging

- Supplier/ Invoice has Irish VAT applied.

2.3 Imported Output Packaging

- Supplier /Invoice has no Irish VAT applied.

2.2 & 2.4 All exports
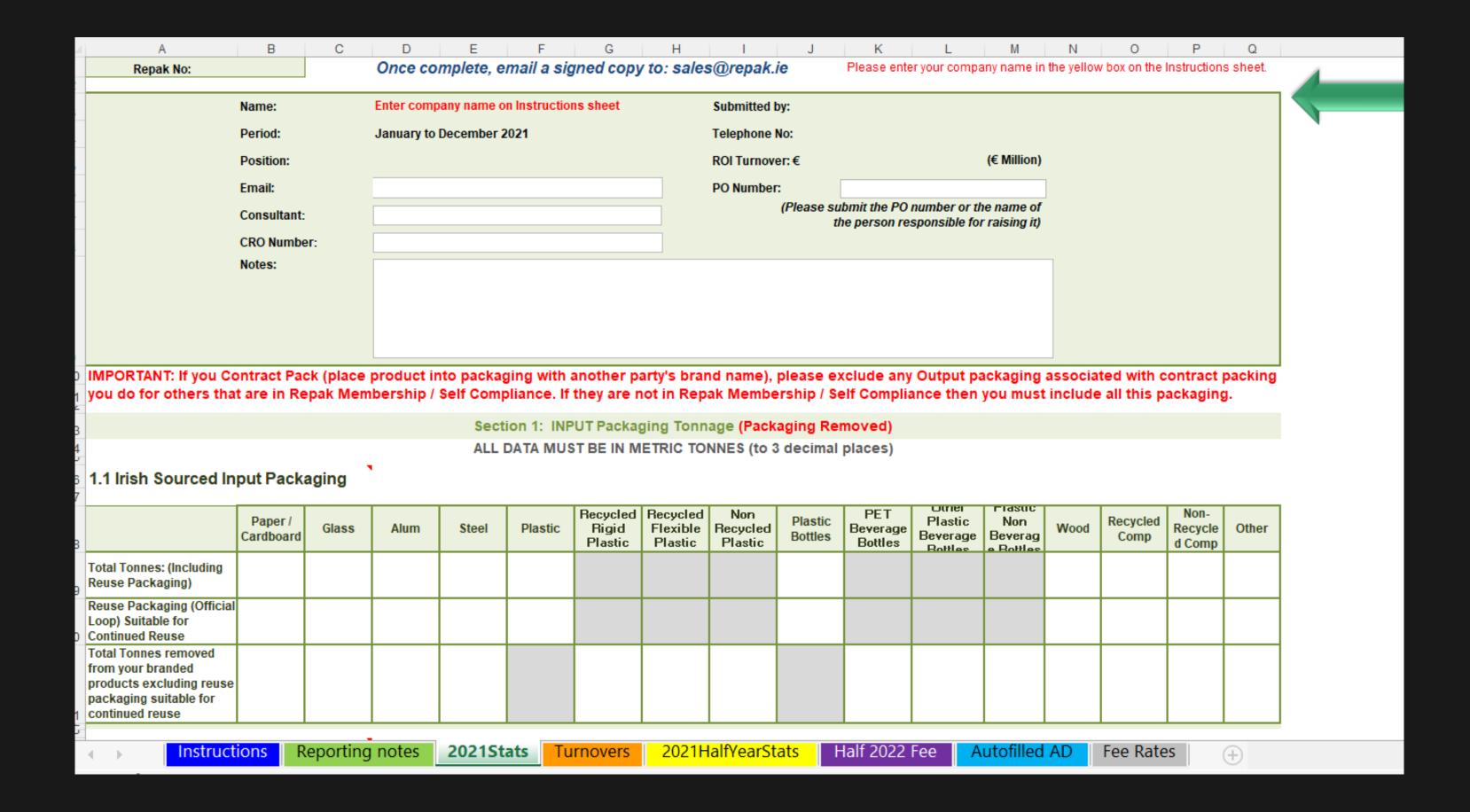
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Packaging Terms

Two Types of Reuse

Official Loop Reuse

❯ Packaging must be:

- conceived and designed for reuse

- make a minimum of 2 rotations

- documented system

Onward Reuse

❯ Packaging is:

- removed from products/goods received

- reused on products sent to your customer

- not returned to you.

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- **Excel file to be completed as part of Registration.**

- **Calculation of fees can be seen once figures are entered.**

- **A fully completed form needs to be submitted to Repak for approval before final costs can be determined**

- **Reporting Broken into 2 Main Sections.**
- **Shared Responsibility of fees**

- **Packaging needs to be identified as**
- **Irish Sourced**
- **Imported**

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Key Points for Reporting

› **Report in Metric Tonnes – 1,000kg**

› **3 Decimal Places – nearest kg**

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Contract Packing – Counts towards the 10 Tonne threshold

If you are the Contract packer or If you have a business contract packing for you.

To determine if you are above the annual threshold you must include all packaging activity carried out by you or on your behalf in your assessment.

Note: The Contract Packer is financially obligated for all goods packed for any non-Repak Member.

If the Contract Packer is not a member of Repak the Brand Holder reports all Inputs and Outputs.

Repak Members can be found on our Member List on our website.

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A Business is a Contract Packer when they …

- Manufacture and/or pack goods for another business
- Pack or repack goods on behalf of another business
- Provide 3rd Party Logistics fulfilment services (Warehousing + pick/pack).
- Contract Manufacture for another ROI business
- Apply packaging to goods that they do not own

Do you meet any of the above criteria?
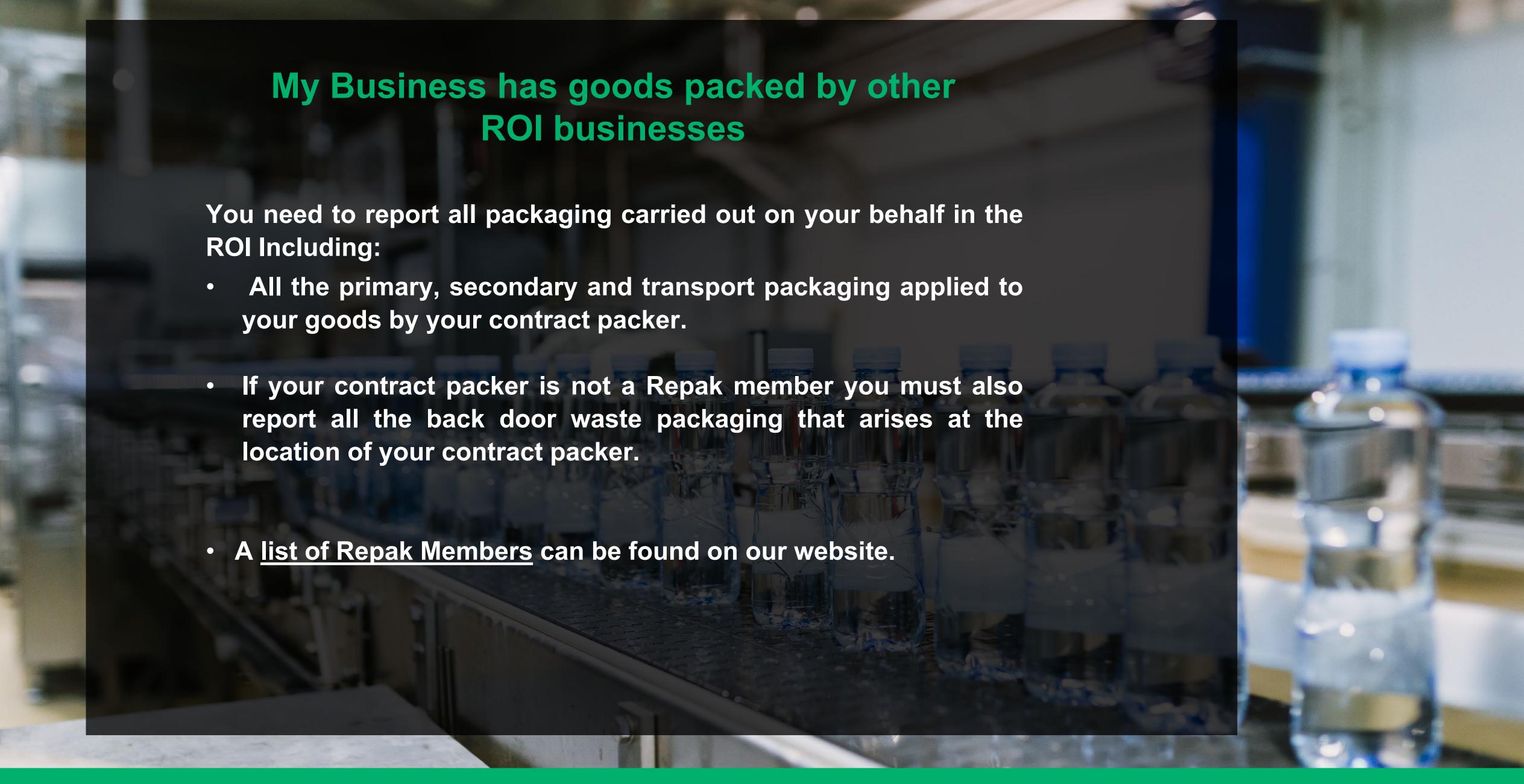
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My Business Provides Contract Packing

You must report all Back Door packaging waste in Section 1 of the report form (split by origin as Irish Sourced and Imported).
This will include:

- All packaging removed from raw materials received that arising at your locations.

- All packaging removed from empty packaging received (from both your own packaging and other brands packaging).

- Any empty packaging applied to your own manufactured goods - branded or plain*.

- Any empty packaging *applied where your customer is <u>**not**</u> a member of Repak.

- For 3PL services - All the existing primary and secondary packaging. Then also all the transport packaging you apply for another business that is **not** a Repak member.

  * applies to primary, secondary and transport packaging.

My Business has goods packed by other ROI businesses

You need to report all packaging carried out on your behalf in the ROI Including:

- All the primary, secondary and transport packaging applied to your goods by your contract packer.

- If your contract packer is not a Repak member you must also report all the back door waste packaging that arises at the location of your contract packer.

- A list of Repak Members can be found on our website.

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Contract Packing – Where to Report on the Repak Form
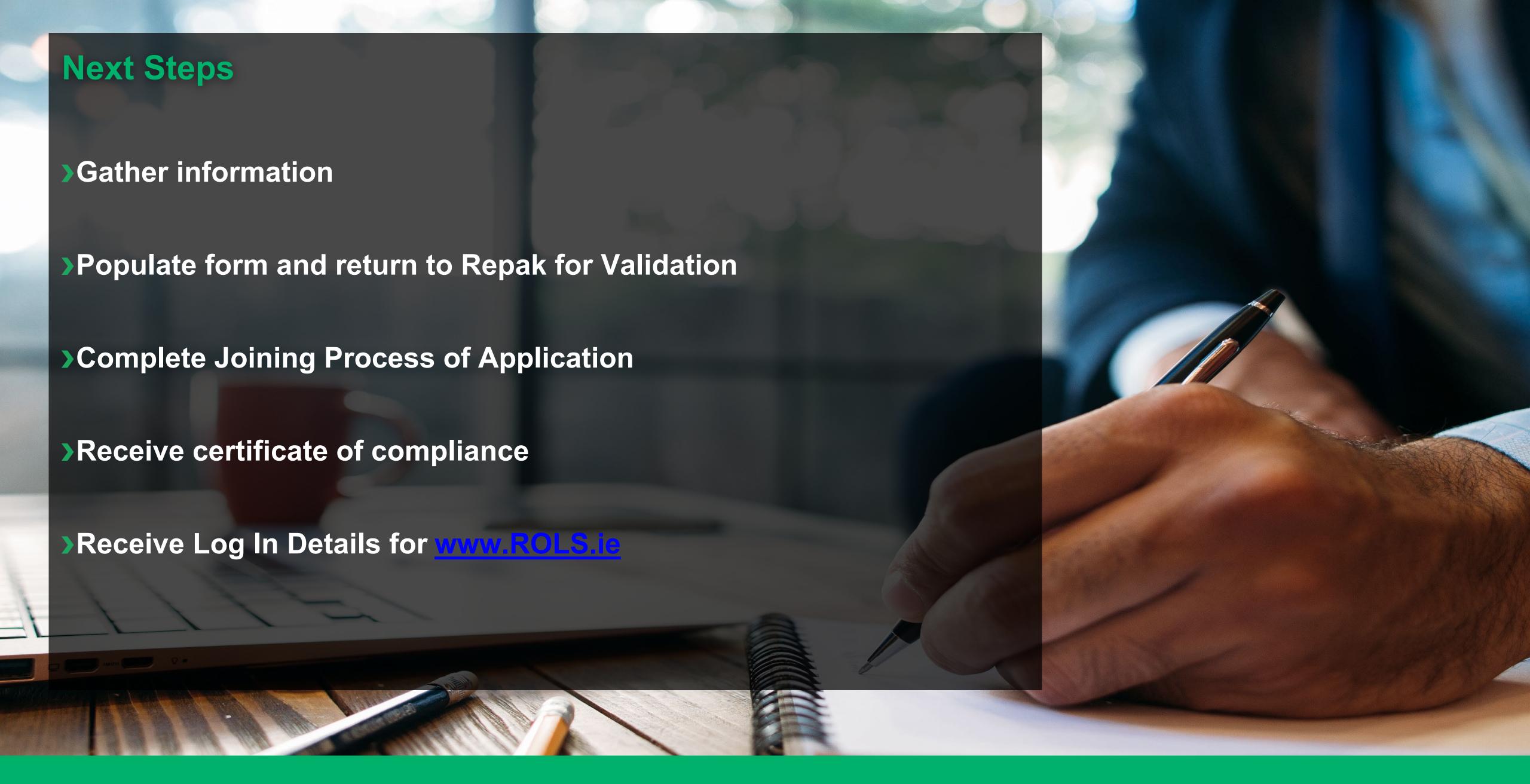
All Input packaging is reported in Section 1.

Any packaging applied by the contract packer that will be removed by the customer as backdoor waste is reported by that customer on the third line of Section 1.1*.

All Output packaging is reported in Section 2.

Further information on Repak's contract packing rules can be found on the [training section of our website](#).

*Total Tonnes removed from your branded products excluding reuse packaging suitable for continued reuse.

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Next Steps

❯ **Gather information**

❯ **Populate form and return to Repak for Validation**

❯ **Complete Joining Process of Application**

❯ **Receive certificate of compliance**

❯ **Receive Log In Details for www.ROLS.ie**

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THANK YOU

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