

19 September, 2023

Re. Consultation: Draft Produce Responsibility Obligations (Packaging and Packaging Waste Regulations) [2024]

Dear Sir or Madam

Thank you for inviting comments for this consultation. IFST are pleased that DEFRA are consulting on the introduction of EPR for packaging across the UK. Please see below comments on behalf of IFST:

PART 1. Section 5 – Drink (Page 15):

This section identifies what is meant by the term 'drink'. IFST recommend that this is expanded to include other beverages often sold through outlets, including smoothies, crushed ice drinks (slushies).

PART 1. Section 5 – Drink (Page 15):

"Food" is defined in Art 2 of the General Food Law Regulation 178/2002, which is to remain on the UK Statutes. "Food" includes drink:

'Food' includes drink, chewing gum and any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment. It includes water after the point of compliance as defined in Article 6 of Directive 98/83/EC and without prejudice to the requirements of Directives 80/778/EEC and 98/83/EC.

It would be useful to include reference to this regulation as part of the definitions of drinks included in this document.

PART 2 Producers and obligations; CHAPTER 1 - Producer obligations: overview (Page 25):

This section defined the responsibilities of small and large producers and sellers. It would be helpful to clarify the obligations for small producers or sellers who may be operating as part of a larger operation or event (for example, an individual outlet operating at a large event or festival), where the impacts for waste may be more significant.

The Institute of Food Science and Technology is the UK's leading professional body that aims to advance the application of food science and technology for the benefit, safety and health of the public. As an independent, charitable body, we bring professional expertise from across academia, industry and the public sector, centered around the professional, sustainable advancement of the UK food system.

Best regards

A handwritten signature in purple ink, reading "Sj French". The signature is written in a cursive style, with the first name "Sj" and the last name "French" clearly legible.

Stephen French, Ph.D

Scientific Policy Director, Institute of Food Science & Technology

