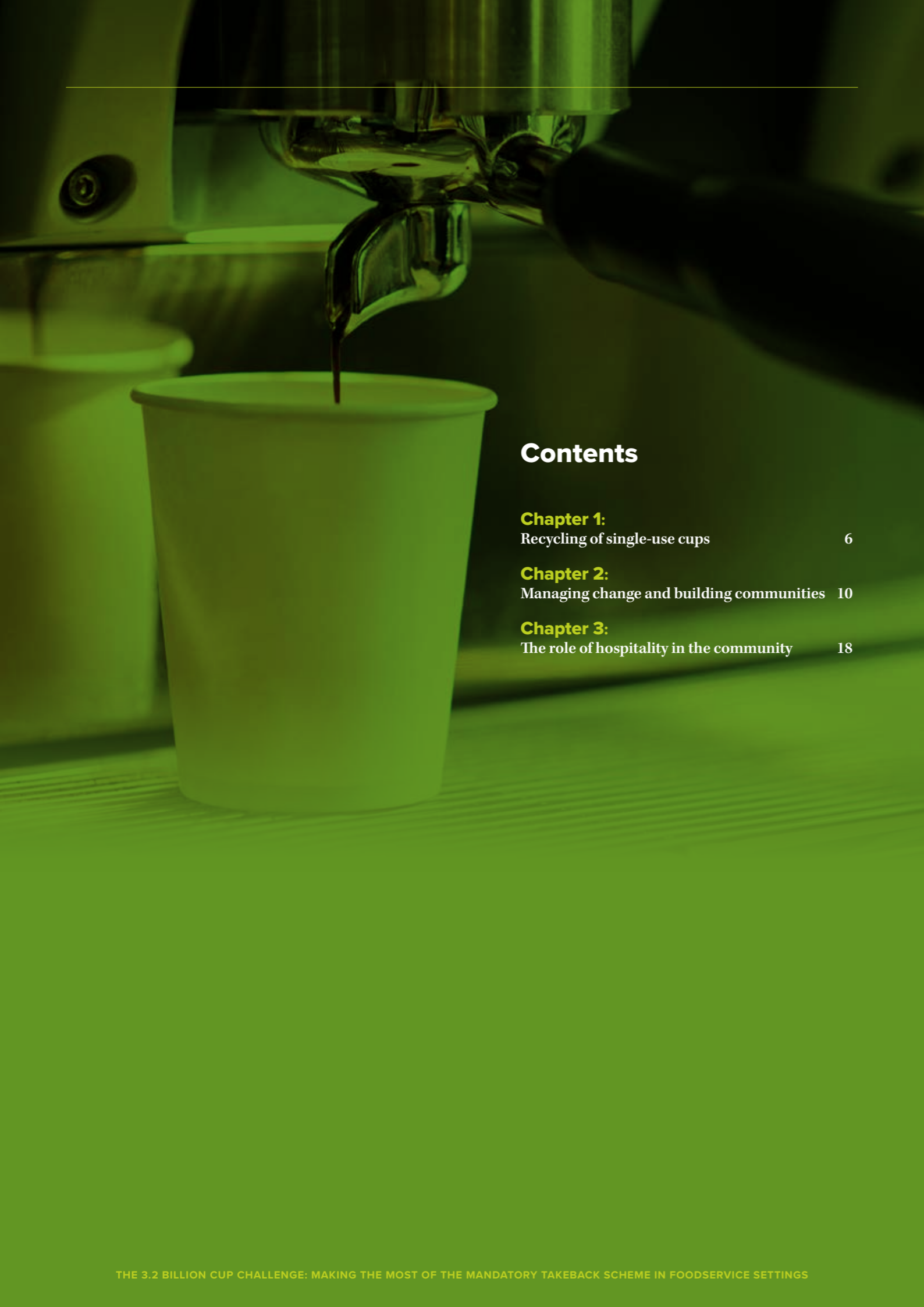




THE 3.2 BILLION CUP CHALLENGE:

Making the most of the mandatory takeback scheme in foodservice settings





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Foreword

THE 3.2 BILLION CUP CHALLENGE: Making the most of the mandatory takeback scheme in foodservice settings?

Sustainable practices in food service settings have never been more urgent. The current number of cups in circulation each year in the UK is thought to be 3.2 billion, according to research conducted by Valpak for the charity Wrap. Both consumers and businesses are eager to do more to recycle their cups, reduce waste and create a more circular economy. The planned introduction of takeback schemes mark a significant turning point in the way we think about waste and recycling.

At Valpak, we have witnessed the challenges and opportunities that arise when working to close the loop on cups in foodservice settings. The success of initiatives to date such as the National Cup Recycling Scheme has been down to businesses having the right knowledge, infrastructure and processes in place to make takeback systems both accessible and effective.

Valpak is leading the charge on this agenda with the National Cup Recycling Scheme, bringing together the largest retailers in the food service industry to collaborate on shared solutions and tackle cup recycling head-on. This initiative is more than just compliance; it pushes the boundaries of what is possible in recycling, creating systems that are convenient for both businesses and consumers and ensuring we divert

as much material as possible from landfill.

Mandatory takeback has the potential to build on this and could become a powerful tool for businesses to actively engage in reducing their environmental impact and encourage consumers to return used items like cups. It could provide greater access to recycling infrastructure and create a level playing field for retailers selling cups. Government impact assessments of the scheme show it could dramatically lift recycling rates. Recycling alone though isn't a silver bullet; we must also encourage reuse to reduce cup use.

This report brings together insights from industry and policy experts, NGOs and consultants to provide valuable guidance for foodservice operators. By sharing our expertise, encouraging collaboration across the industry, educating consumers and businesses alike, we can capitalise on opportunities to transform the landscape of cup recycling and create a more sustainable future for our communities.

Introduction:

In 2018, the BBC's Blue Planet programme sparked interest in plastic packaging. But the focus on single-use cups pre-dates that. It was in fact March 2016 that celebrity chef-turned campaigner Hugh Fearnley-Whittingstall travelled through London in his 'coffee cup battle bus' to raise awareness of the 2.5 billion paper cups being thrown away in the UK every year¹.

The cups were being sold as 'recyclable' but hardly any of them were actually recycled – fewer than 6 million a year, which is less than one day's worth or under 0.25%, were being recycled at a specialist facility in Cumbria. "The truth is, they are barely recyclable at all – in the everyday, commonly understood sense of the word. They cannot be recycled through any of the normal public waste collection services – who are consistently diverting them to be incinerated or sent to landfill," Fearnley-Whittingstall explained.

The focus on cups

Fast-forward to autumn 2024 and everything has changed and yet nothing has. But it is about to. "The UK-wide policy on mandatory takeback [of single-use cups] has been supported by industry bodies as a rational and forward-thinking approach to cup collection and recycling," explains Neil Whittall, head of sustainability at Huhtamaki Fiber Foodservice EAO.

The scheme, which was set to be introduced under the UK Government's extended producer responsibility for packaging (pEPR) regulations, would require businesses selling filled disposable fibre-based cups to provide for the separate collection of used cups (either generated in-store or consumed 'on-the-go'), through both in-store and front of shop collection points. They would also have to arrange for the collection and recycling of the cups. All cups would need to be accepted at collection points, regardless of brand or where the drink had been purchased.

Mandatory takeback, which is now expected to come into force under separate regulations than pEPR, has widespread support across the foodservice and hospitality industry. The scheme could improve recycling rates from that 0.25% to 39%, according to the government's 2021 impact

assessment. (This is based on the results of a trial in Leeds, run by charity Hubbub, which resulted in 600,000 cups being collected from street bins, workplaces and retailers, and then recycled².)

The current number of cups in circulation each year in the UK is thought to be 3.2 billion, according to research conducted for Wrap, a charity, by Valpak³. These are often referred to as single-use 'paper' cups, however most are made from virgin fibre (95%) together with thin liner of polyethylene (PE) plastic (5%). The liner is crucial, serving as a moisture barrier, but this makes recycling trickier as the two materials must be separated.

Recycling of these paper-PE-lined cups is now practical, possible and profitable, as we will discuss. It is however only one part of the paper-cup problem: capturing and collecting them is arguably the bigger challenge. Of those 3.2 billion placed on the market in 2019, just 2.8% were recycled. Industry figures suggest the rate could be double that but that's still potentially 33,300 tonnes of valuable material (fibre) that ends up burned (in incinerators) or buried (in landfill)⁴.

Voluntary industry action, which has resulted in 6,300 collection points being installed across the UK, has not had the impact many

hoped⁵. So, can a mandatory takeback scheme make a difference, and what is needed to make it a success? This report looks to unpick these questions, and more. Through a combination of desk research and detailed interviews with industry and policy experts, NGOs and consultants, we explore:

- Cup recycling today: why it's important and what are the challenges
- Mandatory takeback: the complexities of capturing and collecting cups (practicalities, costs, regulations and customer convenience/preference)
- Preparing for regulation: mandatory takeback is not the only approach governments are looking at
- Convincing consumers: learnings from trials and how innovation can help
- Up the hierarchy: how to reduce consumption of single-use cups.



CHAPTER 1



Recycling of single-use cups

“We were at 6% recycling of cups and gaining momentum, but the pandemic took the wind out of our sails.”

Hannah Osman, Valpak

Whether it is cups or bottles, tubs or trays, recyclers want consistency and a lack of contamination. Cups can sometimes offer neither. From the paper cups used as an on-the-go ‘bin’ for fruit feels and food wrappers to the novel coatings that are boasting ‘plastic-free’ credentials, it can be a messy mix to deal with. “There is a lack of consistency,” explains Rob Tilsley, fibre operations group leader for James Cropper, a specialist paper converter and maker. “The ones we want are made from virgin fibre with a PE-liner,” Tilsley adds, “those are the ones we can absolutely deal with.”

Despite the variety of colours and dimensions among the UK’s large coffee chains, most do fit these two basic requirements. The distinctively coloured and ribbed cups from Costa Coffee currently dominate the bales (each containing around 50,000-70,000 cups) at the James

Cropper mill in Burneside, Cumbria. Initially, the mill took offcuts from manufacturers of paper cups but the development of a process to remove the plastic liner has opened it up to post-consumer waste cups – all 3.2 billion of them.

Paper-based cups

80% of paper cups are ...

... made from at least 92% paper from virgin wood fibre (from the residual left from construction)

... lined with a thin layer of plastic, usually polyethylene (PE)

... 100% recyclable

Source: National Cup Recycling Scheme.

Paper chase

Demand for the finished products is high. The fibre separated from the cups is turned into luxury paper products. Running 24/7, the Cumbria site could take up to 750 million PE-lined cups a year. It’s currently nowhere near that. The UK recycling rate for single-use cups is estimated to be between 2.8% and 6%; some say it is far lower while others claim it could be higher. EPR for packaging should provide more accurate data: the mandatory takeback scheme will likely require businesses to collect

and report the weight of disposable cups sold and recycled.

What is clear is that industry-led schemes have, in the years since those 2016 campaigns, struggled to lift recycling rates. A number of initiatives have tried to boost rates: Save a Cup, the Cup Group, the Paper Cup Recovery and Recycling Group (founded following the Hugh Fearnley-Whittingstall campaign), the Paper Cup Alliance and, currently, the National Cup Recycling Scheme⁶. These have all helped highlight the value of the material the cups are made from, says Whittall at Huhtamaki, but media coverage and claims that the cups are not recyclable have been a “constant challenge” [see *Cups (still) causing confusion*].

Footprint research published in 2023 showed Costa Coffee had managed to recycle over 165 million cups since its scheme began in 2018 (against a target of 500 million)⁸. Industry insiders suggested their efforts, which have resulted in over 6,300 collection points being introduced across the UK, may suffer from a “visibility challenge”. Only 1% of 1,200 individuals use cup recycling bins, according to the National Paper Cup Recycling Scheme. That scheme was set up in 2018 by Costa Coffee and Valpak and is currently co-funded by seven

Cups (still) causing confusion

“Paper takeaway cups are not recyclable, though some coffee shops have switched to biodegradable or compostable versions.” This line from a BBC article earlier this year – titled ‘What can and can’t be recycled from your food shop’ – is an example of how the management of fibre-based cups continues to cause confusion⁷. The fibre-based cups are recyclable but need to be collected separately (for example, via the National Cup Recycling Scheme). Communicating this message will be crucial to the effectiveness of the mandatory cup takeback scheme. As for compostable and biodegradable cups, these present challenges too. Industrially compostable cups, which have become an increasingly popular option for independent coffee shops, need to be collected separately for composting or anaerobic digestion.

other major brands including McDonald’s, Caffè Nero, Pret A Manger, Greggs, Burger King, Pure and Lavazza Professional. The aim is to bring together major retailers, waste management companies and UK paper mills all with the shared aim of growing the infrastructure needed to increase the number of

paper-based cups being collected and recycled in the UK. The website says 204 million cups have been recycled since 2018. The last update on progress, in 2020, showed 6% of all cups were recycled (just missing the target of 8%).

“We were at 6% and gaining momentum, but the pandemic took the wind out of our sails,” explains Hannah Osman, national

cup recycling manager at Valpak. Since 2022, there has been an increase in capture rates with the scheme also introducing a ‘box service’ to collect cups from SMEs “no matter what the volume is”. However, there is work to do in educating people about what to do with cups, what happens to those collected and, crucially, how they are recycled.



TURNING COFFEE CUPS INTO BEAUTIFUL PAPERS AND PACKAGING

Trouble at mills

There is also confusion within the food sector regarding fibre-based packaging. Under pressure to remove plastic from their packaging, many companies have turned to fibre-based packaging; the UK’s paper mills ideally want these items to contain no more than 5% plastic but 10% is manageable⁹. This should make cups acceptable but it is not quite so black and white. “We are still genuinely trying to get an answer from some of the mills,” says the sustainability lead at one coffee chain. “We are not quite clear what the issue is [with cups],” they add.

Figures from the Confederation of Paper Industries (CPI) show that of the 5 million tonnes of paper

packaging sent to mills, 2% (or 120,000 tonnes) is ‘challenging to recycle’. Separation is key, with co-mingled collections of dry mixed recycling creating problems – and costing money. There has been a “decline” in the quality of post-consumer PFR being delivered to UK paper mills in the past decade, says CPI: “The UK has a significant surplus of recovered fibre for recycling, and to secure export outlets, we need to ensure it is of the highest quality and we have recovery systems in place that deliver a high-quality raw material to reprocessors.”

Paper cups and other laminated food packaging remains “problematic” for most high-volume

paper mills with “standard” pulping technology, says CPI in its position paper on cups. They are however a valuable source of quality fibre. In fact, the cups have now become one of the highest valued fibre materials on the market due to the National Cup Recycling Scheme.

A mandatory cup takeback scheme could improve separate collections, increase volumes, reduce contamination and cut carbon emissions further. Mandatory takeback will provide a “solid footing” for collection of cups and “give confidence to collectors that there is a market for their service”, says Huhtamaki’s Whittall. “This can only support recycling rates,” he adds.

Credit: James Cropper



CHAPTER 2

Consumers, capture and collections

“We could take 750 million single-use cups a year if we’re running the process 24/7.”

Robert Tilsely

McDonald’s, Costa Coffee, Pret and Caffè Nero all collect single-use cups in-store and will take any brand of cup. Their outlets are now part of a 6,300-strong UK network of collection points for fibre-based cups, with a minimum capacity of 1.6 million cups. This network has grown from 4,800 in 2020^{10,11}.

The expansion, fuelled by consumer, campaigner and political pressure, has been impressive. But the capture rates, despite the efforts of some in the industry, are less so – as little as 2.8% of cups are recycled each year despite the majority of the cups being recyclable and there being capacity to reprocess them here. “All paper cups used on the UK high street can be recycled in the UK today, currently across four recycling facilities [DS Smith, ACE UK in Halifax, James Cropper, and Essity] with additional spare capacity,” noted the Paper Cup Alliance in a submission to MPs in 2021.

DS Smith ceased to offer a cup collection service in February 2023. “[...] it became unviable to collect small volumes of cups from around the country,” explains a spokesperson, but with the mandatory takeback scheme on the horizon, they expect to see a greater volume of coffee cups being collected for recycling in the UK.

Without a specialist system in place, cups are problematic for recyclers – the cups’ weight to volume ratio makes it an inefficient item to manage. Separate collection and recycling of cups is gathering momentum again after a pandemic-induced dip. “This is valuable, sought-after material and there is plenty of capacity available,” explains Roger Wright, waste strategy and packaging manager at Biffa, which in January launched a nationwide cup collection scheme.

Many businesses were eager to do more to recycle their cups but the UK lacked sufficient options for the convenient and efficient nationwide recycling of these cups, says Wright. The contractor therefore offers UK mainland businesses – from cafés and restaurants to service stations and supermarkets – a “fully integrated disposal, collection and recycling solution for their used cups”. These end up at James Cropper’s plant in

Cumbria, which recycles the paper and has found a market for the plastic liner too (see *Breaking the mould*). “This is the only UK mill that’s really willing to take these cups en masse,” says Wright, “the others don’t really want them.”

Paper (cup) chase

These cups are not easy to capture though. In 2019, *Footprint* produced a report on packaging¹². This was pre-covid and arguably at the height of the backlash against plastic in particular. The challenges facing foodservice companies to ensure more of their waste was not only recyclable but recycled was made clear in this statement from one cup manufacturer: “It’s not about the cups but a combination of what people do with them and the infrastructure. It doesn’t matter what goes in [street bins], whether it’s a cup or a gold bar, it’ll be incinerated.”

The controversy over ‘recyclable but not recycled’ cups at the time actually lifted the lid on a much wider issue: the failure of on-the-go recycling. This remains true today. High street bins are highly contaminated and shrinking in number and, while cup recycling rates may hover around 3%, the figure for other types of fibre-based packaging used by foodservice is close to 0%³.

Breaking the mould

Single-use fibre-based cups have become crucial to both foodservice companies and consumers wanting a convenient on-the-go option. They have become iconic – think of Costa Coffee’s easily distinguishable red, ribbed cup, the blue of the cup from Nero, the maroon lid atop a Pret flat white, or Starbucks’ white cup with its globally recognised logo. This is great for brand recognition, but not so much for those looking to recycle them.

There are specialist facilities capable of doing just that though. Nestled in the small village of Burneside, in Cumbria, the James Cropper plant includes paper and materials science operations. “We always have an eye on what we can do next,” says the company’s fibre specialist Robert Tilsley.

Bales of cups are piled high, the brands easily recognisable. But the business is preparing for many more to come thanks to the proposed mandatory takeback scheme. These cups last just a few minutes before being thrown away, with the valuable virgin fibre used to make them ending up in energy-from-waste plants, in landfills, or worse as litter. Tilsley would happily take millions more of them here in Burneside. “We could take 750 million a year if we’re running 24/7,” he says.

The cups are delivered here via the National Cup Recycling Scheme and contractors Biffa and Veolia, and all are hoping for volumes to rise both in the run-up to and launch of a takeback scheme. There has been a “real shift in demand” for the products the mill makes from reprocessed paper cups. These include greetings cards for Hallmark and happy meal books for McDonald’s Germany. And thanks to a partnership with Cumbria Waste and New Horizon Plastics in North Wales, the plastic liner is no longer sent to energy-from-waste plants – it is converted into pellets and applied to commercial packaging and agricultural applications.

These on-the-go items are used for a matter of minutes before being spread far and wide – as well as in street bins they can end up in the bin at home, in the office, at the next service station or, worse still, in the layby. Better infrastructure is crucial and will be part of the ‘producer pays’ mantra that underpins EPR.

However, “you also need to get people to care about this”, says a former sustainability lead at a major UK coffee chain. This includes both customers and staff.

One of the “hurdles facing us in the paper cup industry is educating the consumer that these cups are, in fact, recyclable”, notes paper cup

manufacturer Benders. Indeed, in conversations with those involved in the manufacture, use, collection and processing of paper cups the confusion amongst consumers comes up time and again.

“If you ask people whether these cups can be recycled or not there is a 50-50 split between those who say ‘yes’ and those who say ‘no,’” explains Valpak’s Osman. “There are also those who don’t believe recycling actually happens,” she adds. This is why many of those in the supply chain have created videos to show what happens to paper cups when they are collected and recycled – but the message is taking time to cut through.

Cup counts

Academics have suggested the current issues have been preserved by ‘herd mentality’: previous actions by others have influenced people’s behaviour, perpetuating and legitimising incorrect disposal, noted researchers in a 2022 paper for *The Design Journal*¹³.

Hubbub research in 2019 in Leeds showed that “despite extensive communications there is still widespread public confusion about whether cups can be recycled and a lack of understanding that they require their own bin”¹⁴. The level of public understanding on this issue

is quite low: 71% didn’t know the cups have to be collected separately in order to recycle them; 95% thought they should be able to be recycled¹⁵.

The TakeItBack trial run in 2023, and taking place in Dundee and Glasgow in partnership with the National Cup Recycling Scheme and Starbucks, showed that 22% of people disposed of their single-use

cups in recycling bins, so “raising awareness that [these cups] need to be recycled separately will be an important step in encouraging more people to take their cups back to participating retailers”, reads the March 2024 evaluation report¹⁶.

The trial involved 121 stores: Caffè Nero (17), Costa Coffee (24), Greggs (13), McDonald’s (38), Pret (6) and Starbucks (23). Bin audits

showed how the campaign, which included in-store communications, digital advertising in the cities and social media activity, reduced the numbers of single-use cups placed in street bins. Cups from the brands involved made up 52% of cups found in the street bins in March 2024, compared to 64% in July 2023.

“One thing I’ve learned is that once they’ve drunk their coffee that



“We are trying to change people’s view of these cups. People will react differently when they understand why we are collecting them separately and the benefits of doing so.”

Sam Kinnear, commercial manager, Valpak

cup is now waste and they make a quick decision about what to do with it,” says Valpak commercial manager Sam Kinnear. “We are trying to change people’s view of these cups. People will react differently when they understand why we are collecting them separately and the benefits of doing so.”

Happy to help

This engagement effort must extend to staff: if they are not on board with collections of paper cups then these schemes start to fall apart. Staff in 14 stores were asked whether they had heard of the #TakeItBack campaign, only one person answered with a confident yes that

they’d heard of the campaign. “There is a significant advantage to having in-store collateral to raise awareness for both staff and customers that people can recycle any single-use cup in-store,” the output analysis notes.

Visits to stores as part of this Footprint Intelligence report

TakeItBack reduces cups in street bins

The campaign used bin audits to determine whether consumers were now returning their cups to collection points rather than sticking them in street bins (which end up in landfill or incinerators). Overall, the cups found in the street bins dropped by 43% in Glasgow and 30% in Dundee.

Cup brands		Glasgow		Dundee		Overall
		July	March	July	March	
Funding partners	Caffé Nero	35	33	7	4	79
	Costa Coffee	58	35	63	39	195
	Greggs	45	63	144	87	339
	McDonald’s	79	19	200	96	394
	Pret A Manger	35	33	0	0	68
	Starbucks	231	63	48	20	362
Other significant counts	Baynes	0	1	61	59	121
	Burger King	25	2	0	0	27
	KFC	0	5	22	8	35
	Subway	1	4	8	2	15
	‘Other’ brands	196	130	204	195	725
Compostable/biodegradable		22	29	0	17	68
Total Cups		727	417	757	527	2,428

Source. TakeItBack: evaluation report for NCRS, March 2024

showed there is a lack of in-store signage or staff awareness in current cup collection activities. At one store in Harrogate, staff were aware of the scheme and what happens to the cups but had no idea why in-store signage to promote the scheme had disappeared (“since covid”). Indeed, some stores have removed bins designated for cups in favour of a ‘hand it to staff’ approach which saves space out front but requires communication and a fully engaged workforce.

Bin space in stores is an issue. Concerns have also been raised about the health and safety risks of people bringing in any cups, and whether the ones they do are actually recyclable (that is, fibre-based with a PE lining). “[...] with good practices there should be no risks,” says Whittall at Huhtamaki, and offering a drop off service for any cups is perhaps a way of attracting them through the door in the first place, he adds.

Outside the stores, for example on the high street, at train stations or shopping centres, the type of bin – and even the colour – matters. Orange worked well in Hubbub’s LeedsByExample trial, proving popular on social media too. In the course of a year some 1.2 million cups were collected from designated on-street bins, retailers



Credit: James Cropper.

Sodexo for example has cut back from 727 SKUs to 192 and from 12 suppliers to just two and many of those dropped were compostables

Lift off for fibre lids

Messaging aimed at cup recycling is complex. It is not only the cup that needs to be considered, but any excess liquid, the inclusion of a sleeve and the lids. In 2019, 2.9 billion lids were placed on the market – 98% were made from polystyrene and 2% from PET³. None of them were recycled. “The days of unrecyclable single-use plastic are over,” says one sustainability lead, “so polystyrene lids shouldn’t exist”.

Some are now moving towards fibre lids, which can be collected and recycled with the cups. Coffee drinkers will need to understand the difference between old lids and the new. Costa Coffee introduced fibre lids to 150 stores in 2022¹⁷. Huhtamaki “continues to invest in capacity” for its fibre lids because the market “will grow”.

and managed spaces. Bottles and cans were also targeted but “cup bins collected the largest volume of target material of any collection method, suggesting high demand for cup bins around target areas like transport hubs with commuters”.

The trial also showed the stacking funnels, which offer separate sections for cups, lids and excess liquids, can work well provided they

are regularly checked and emptied (see *Lift off for lids*, p16). “The visual nudge helps people separate out the right parts,” the charity explains, but these sometimes don’t work in very high footfall areas. This tallies with the finding from the NCRS survey that 95% of people surveyed said they would use a cup bin on the high street if it was available.

Closed loop

Paper cups for on-the-go consumption present considerable challenges in terms of communication and collection of the used cups. But what about so-called closed environments, such as those overseen by contract caterers like hospitals, stadia, universities, office blocks and city attractions? “There are challenges but they can be different ones,” explains Georgina Camfield, head of ESG at Aramark UK & global offshore.

Consider for example a theme park where the audience is largely transient, which can make running campaigns or pilots to trial new initiatives tricky. In the headquarters of financial services firms the messaging is repeated to the same crowd – and if they are tuned into environmental initiatives it’s a bonus. “The architects focused on sustainability tend to be the most engaged,” explains

Annette Price, ESG manager at The Good Eating Co, part of Sodexo UK&I. “But you need a robust communications plan tailored to the site to overcome the intention-behaviour gap,” she adds.

The plan is also specific to the cups. While paper cups ideally come clean and contamination-free, in composting “food is vital”, says Lucy Frankel, former environmental and communications director at Vegware. Indeed, compostable packaging can be used as a vessel for food scraps, diverting such biodegradable waste away from landfill and into in-vessel composters or anaerobic digestion facilities.

Aramark uses compostable single-use cups made by Vegware. Camfield is also aware of the issues with compostables: they can be difficult to capture in sizeable volumes before sending for specialist treatment, for example. Some of Aramark’s sites have access to these facilities but in many cases the waste is managed by companies contracted by the client so will invariably end up in landfill or at energy-from-waste plants.

Compostables have proved popular among foodservice operators, especially small, independent coffee shops, but some larger companies have begun

“You need a robust communications plan tailored to the site.”

Annette Price, The Good Eating Co

to reduce their offer as they look to rationalise their packaging range. Sodexo for example has cut back from 727 SKUs to 192 and from 12 suppliers to just two and many of those dropped were compostables, explains head of procurement Simon Turner. “We are in the process of reviewing various reusable systems to reduce consumables usage and will be deploying these in coming months.”

Latte levy

Sodexo and Aramark are among the caterers running trials to better understand reusables. Cost remains a barrier with schemes often priced higher than current single-use options (there are also high rates of cups going missing, especially in the early stages of any scheme, which was also the case with a Burger King trial¹⁸).

New laws in countries like France have required fast food companies and caterers alike to offer reusable packaging when customers are eating or drinking in. There is support from the likes of WWF-UK and City to Sea for similar rules in the UK (plans to do this at an EU level through the packaging and packaging waste directive have been watered down¹⁹). Some 26,000 people have signed City to Sea’s petition calling for a complete ban



Credit: James Cropper

on single-use packaging in dine-in settings²⁰. “This is a popular policy,” explains the organisation’s CEO Jane Martin, and one which can “shift an entire sector from single-use to reuse”.

Currently, there is interest in how mandatory takeback of cups, under EPR, can work alongside plans in Scotland to place a 25p charge on cups²¹. While takeback focuses on recycling, Scotland’s so-called latte levy aims at reuse and reduction. The two will be “complementary” according to ministers. “[...] even with a minimum charge, there will still be instances where disposable cups are used,” a spokeswoman for the Scottish Government explains. “A mandatory takeback requirement would ensure that businesses

support these cups to be recycled in suitable facilities.”

Under consultation proposals, retailers would be able to retain reasonable implementation costs from the charge – mirroring the approach taken for single-use carrier bags²². It also seeks views whether the net proceeds from a charge should be kept by businesses and used for good causes or collected by local or national government. “While many businesses already have offers in place to encourage the use of reusable drinks cups, hundreds of millions of single-use cups are still being discarded, creating 5,400 tonnes of waste every year,” said acting net-zero secretary for Scotland Gillian Martin.

CHAPTER 3

New rules promise rise in recycling rates

“I do believe that policy and legislation drives behaviour change when it’s communicated correctly and from the right people.”

Georgina Camfield, Aramark

Reform of packaging regulations has been underway since 2018, when England’s resources and waste strategy was published²³. It has been a slow process, hindered by the covid-19 pandemic and the war in Ukraine, as well as political upheaval and the complexities of the policies. There are encouraging signs that the new ministerial team at the Department for food, environment and rural affairs (Defra), is keen to hit the ground running.

Mary Creagh is the new waste minister and will have to juggle a suite of packaging reforms that have been stuck in the system. This includes simplified waste collections from homes and businesses; a deposit return scheme for drinks containers; and extended producer responsibility for packaging (pEPR). “We are reviewing the suite of packaging

reforms,” said Creagh in August, before publishing “illustrative” base fees for different packaging types under pEPR^{24, 25}.

EPR you ready?

EPR is the major reform of UK packaging waste regulations. The idea is to ensure that producers of packaging meet the entire costs of managing this waste rather than the current 10%. Margaret Bates, head of the UK pEPR scheme administrator, has called it a “game changer”²⁶. She has also admitted that it won’t be perfect from the get-go. “We have to manage expectations. It’s important we have an EPR scheme that is robust, transparent, credible and fair, but also that it can be improved on.”

There is a lot more data to report for example²⁷. EPR is a reform of the existing UK packaging waste regulations but this year the two systems are running in tandem for data reporting. This means that producers will be obligated to complete data reports in line with new EPR requirements and continue to submit packaging data under the historic regulations.

They will also have to report the packaging they send for recycling broken down by material categories.

Illustrative fees were published in August; revised figures were then issued in September. The more

easily recyclable the packaging, the lower the fee. It is proving more complicated than that, with the government being challenged over the fees. The second iteration of indicative fees is “clearly a step in the right direction”, said the Foodservice Packaging Association (FPA), but “whether it satisfies all materials and all packaging types is unlikely”. Currently, those fibre-based cups attract the most expensive fees at £450 to £525 per tonne, but if recycling of cups improves then the fees should fall.

Takeback

There are high hopes that a mandatory takeback scheme, proposed under EPR, could be that trigger. “It’s definitely a positive step,” says Louisa Goodfellow, policy manager at compliance scheme Ecosurety. This kind of intervention is “only appropriate for certain materials and cups are one of them,” she adds: “It should provide certainty and a clean stream of cups.”

The range of benefits for collecting fibre-based cups separately and recycling them has been detailed elsewhere^{28, 29}. Here it is worth noting, briefly, the environmental benefits. A life cycle assessment published in the *Journal of Cleaner Production* in 2020 showed the UK’s annual carbon footprint

from paper cup consumption was 75ktCO₂e with recycling reducing this by up to 40%³⁰. Switching to reusables would cut carbon further, according to the researcher.

A study commissioned by Huhtamaki in 2019 also showed that if single-use paper cups are recycled their carbon footprint falls dramatically^{31,32}. The ‘regular’ PE-coated cup had a footprint of 8.1g CO₂e, according to the life cycle assessment, based on 30% of materials being landfilled, 34% incinerated and 36% recycled. If recycling is 100% then this falls by 53% to 3.8g CO₂e. For a plant-based PE cup it falls even further – by 65% to 2.8g CO₂e.

First, we have to get to 36% of course. Industry support for a mandatory takeback scheme is widespread. Legislation can be a “wonderful thing” because “it speeds everything up”, explains FPA executive director Martin Kersh. The takeback scheme is “the right thing to do,” he adds, and “we’re really keen to get going with it”. This regulatory stick is not a magic wand, though: the entire supply chain will need to work together on campaigning, infrastructure, staff awareness and data collection in order to maximise the scheme’s impact and push recycling rates up. If not, the risk is that consumers

It’s high time for takeback

The mandatory takeback scheme for cups, which was part of pEPR, would have required businesses selling filled disposable paper cups to provide for the separate collection of used cups (either generated in-store or consumed ‘on-the-go’), through both in-store and front of shop collection points, and to arrange for the collection and recycling of these cups. The takeback requirement would extend to accepting all disposable paper cups at these collection points irrespective of brand or where the drink was purchased.

will disengage, EPR fees will rise and the government will be forced to introduce even more interventionist policies.

With collaboration crucial and convenience also key, some want to see the de minimis removed. The proposal under the Conservative government was that businesses with fewer than 10 staff would be exempt from having to comply with mandatory takeback. It estimated that around 20,000 businesses would be ‘in scope’ with 75,000 additional outlets offering takeback. According to the final pEPR impact

assessment³³: “It should also be noted that as the recycling market for fibre-based composite packaging grows over time, more data and insight into the structure of the sector will arise which may enable new possibilities for the setting of a de minimis level. The de minimis level and the impacts of those obligated will be monitored and reviewed in order to ensure that the policy is maximising impacts while minimising impacts on businesses.”

Costs

There will be a number of impacts

Producers exempt under de minimis options

Employment Size band	No de minimis	<5	<10	<20	<50
Cups sold by businesses in scope	3.22bn	2.84bn	2.33bn	1.76bn	1.1bn
Cups sold by businesses out of scope	0bn	0.38bn	0.89bn	1.46bn	2.12bn

Source. EPR final impact assessment³³



on businesses when the scheme is introduced, either in 2025 or 2026. High among the concerns raised during conversations with industry are the practical and financial aspects.

The additional costs of pEPR (a total of some £1.4bn³⁴) are difficult for companies to swallow but the regulations have been a long time coming. Those using cups will also have other costs to think about – everything from buying new bins (£20m industry wide) to training staff on an ongoing basis (£3.5m in the first year). There also need to be campaigns and in-store advertising; and who pays for this and what the cost will be is being hotly debated. “It should be right that operators who collect materials will see some of their EPR costs offset but we are yet to see the detail on how this might operate,” explains Neil Whittall from Huhtamaki.

Businesses are concerned they will be paying for both EPR and to be part of a mandatory national cup recycling scheme – which many feel has to include a national advertising campaign and ongoing communications in order to heighten engagement. Consumers have to take on some responsibility too; after years of simply chucking cups away, inspiring this kind of change in behaviour will require

all the marketing skill of the major foodservice brands.

The more engaged consumers, staff and companies are, the more cups will be recycled and the more efficient the whole process becomes. In turn, EPR fees for the cups should fall accordingly. “Investing in collection infrastructure and communication campaigns to influence consumer behaviour will also help reduce disposable cups being littered,” noted the government in its consultations.

Cup complex

There are various practicalities that the industry must work collaboratively on – not least the type of cup placed on the market. This is where the issue started – with cups billed as recyclable not actually being recycled. Four in five of the cups used today are “100% recyclable”, according to industry and specialist paper mills, being virgin fibre and lined with traditional PE or bio-based PE. The likes of James Cropper clearly want them, and contractors are prepared to collect them. This is good news.

But what about the other 20% of cups? Compostable cups using a plant-based PLA lining are particularly popular across independent coffee shops. They

have however caused some confusion – if they were not part of a mandatory takeback scheme then would this push some companies to switch to compostable options which rarely find their way into industrial composting facilities?

The draft proposals for the scheme note that composting of such packaging (for example in industrial in-vessel composters or via anaerobic digestion plants) is considered to be ‘recycling’. Some manufacturers of compostable cups have made moves to ensure their cups are genuinely compostable and recyclable. Vegware’s cups for hot drinks are for example certified recyclable by the PTS lab test (which replicates how a standard paper mill recycles paper and card), have an On-Pack Recycling Label (‘Recycle at coffee shop or recycling point’) and are accepted by the National Cup Recycling Scheme. “Whilst reviewing and testing our fibre-based products for recyclability, Vegware conducted in-depth interviews with paper mills, waste collectors and labelling experts,” the company notes³⁵. (As this report was being published there was confusion about whether mandatory on-pack recycling labels would become mandatory as planned).



Plastic-free

The challenges around compostable and biodegradable cups are well understood (if not always agreed upon). There is increasing confusion and concern over some of the novel barriers being used for cups in a bid to replace traditional plastic. Brands continue to test and trial cups that they hope to market as 'more sustainable', including those with 'aqueous coatings'. Concerns have existed around such cups - which require a different recycling process - for some time, but are currently heightened as interest in the concept snowballs and companies buy into it.

"With one in every two of us visiting a coffee shop several times a week the long-lasting damage coffee cups can have on the planet without being properly recycled is huge," said Alex Freudmann, MD for M&S Food in October 2023 as he launched a "sustainable alternative [...] the first fully recyclable coffee cup on the high street". The cups "use a lining material which replicates the same barrier effect of plastic and performed just as strongly as plastic in independent testing and assurance but without the same long lasting environmental impact if not properly recycled. The material has a plastic free accreditation and ensures even if the cup ends up in

landfill it will break down and leave no harmful plastics behind," said the retailer³⁶. The cups were rolled out more widely in March 2024 but the reference to them being "plastic-free" was removed³⁷.

M&S's cup is certified plastic-free by Flustix but more details are not available due to "IP protections". This leaves recyclers with a problem because the aqueous coatings some packaging producers are using on their fibre cups (and other food packaging) can break down and become part of the paper which can leave flecks in the final reprocessed products, for example. That's no good for those seeking high-end paper products from the likes of James Cropper - not to mention the issues that it can cause for the plant machinery too.

Collective action

Beyond the makeup of the cups there are many other areas where foodservice can (and must) collaborate to improve recycling rates. The experience of the National Cup Recycling Scheme, plus trials run by the likes of Hubbub and key high street brands, will prove invaluable in addressing these and delivering the most effective scheme possible.

In-store bins. The draft regulations note that premises within scope

must have at least one collection point (eg, a bin) in-store for fibre-based cups and which is "clearly visible". A practical concern for smaller outlets is therefore space. This doesn't just impact independents: Greggs for example has an increasingly large presence on UK high streets but outlets tend to be small with very little space front of house. The finer details of where the bin must be, and whether it can be back of house, have yet to be confirmed. Some cafés are fearful of becoming a "dumping ground" for the bigger high street brands. New laws in Wales actually require businesses to include paper cups in separate collections alongside other fibre-based packaging like cartons³⁸. "If [cups] arrive at our mills as a separate stream, we can then control the feed of them, into our recycling processes," a DS Smith spokesperson explains.

Consistent message. The price of a bin that allows people to separate the different components of a cup is around £300³³. Having these all over the UK in stores could cost around £20m (though it could be double that if more micro businesses are mandated to have them). Care must be taken to ensure there is some consistency here from region to region - that is, a range of different bins requesting different



actions might only cause confusion, especially in places like motorway services and train stations. In previous trials surveys showed that people can feel uncomfortable recycling a cup in a different store to the one in which it was purchased, so more public awareness is needed to promote this. Recycling of cups needs to become "normalised" - which could even have a knock-on impact for future schemes focused on reuse. "I do believe that policy and legislation drives behaviour change when it's communicated correctly and from the right people," says Georgina Camfield at Aramark. "Increasing recycling is of course important to reduce waste going to landfill but the best solution is to reduce single-use items in the first place."

Street bins. There is an argument that customers entering a store to drop off a cup could become new customers; however collaboration with local authorities will be essential. Councils could for example provide support for smaller firms by offering centralised drop-off points. Hubbub research has shown that orange bins were very popular and successful in its trials, and placing them next to general waste/litter bins helps reduce contamination with unwanted items. The need for clear, compelling information to

change behaviour is shown across a number of academic studies, which means there needs to be a focussed industry and government collaboration - and that extends to finding funding for investment for the right kind of infrastructure to enable more on-the-go cup bins and potentially household recycling solutions for cups - habits have changed and more brands are not, for example, delivering hot and cold drinks for customers to enjoy on their own sofas.

Training. Staff engagement in any scheme must be high. There will therefore be training and familiarisation costs, which are likely to be ongoing given the high turnover in staff across foodservice and hospitality. Indeed, it's really important to maintain momentum in the scheme to avoid 'rebound effects', such as apathy or distrust, among consumers. "If staff don't engage with a recycling initiative then it just doesn't work," says Kinnear at Valpak. "The brands

Choose to reuse

"The cup is 20% of our waste footprint globally, but more than that, it is an icon," Starbucks chief sustainability officer Michael Kobori told CNBC in 2022³⁹. "This is Starbucks' icon all around the world, and if we can replace this disposable cup, this symbol of waste, with this reusable [version], we completely change people's mindset."

Industry-led initiatives have done little to increase recycling rates or uptake of reuse which is why governments are introducing new regulations, like mandatory takeback and a charge on disposable cups.

One way for businesses to avoid all this new policy is to adopt reusable systems instead. "With the introduction of an EPR approach, sticking to single-use will come at a significant cost for businesses that can be avoided by moving to reusable packaging," explains George Martin from City to Sea. Currently, reuse systems come at a premium to single-use (and lack scale on the high street) so it will be interesting to see if the scales tip once EPR fees and the mandatory takeback scheme have been confirmed. "The solutions must be more cost-effective than the problems," says Martin.

This cannot be a case of recycling versus reuse. Indeed, schemes aimed at recycling, like mandatory takeback, must work alongside reuse rather than against it. They can even complement one another. The behaviour of returning a paper cup will tune people in to the value in their waste and their responsibility to put it in the right bin, but it could also make many think that a model like this can be equally convenient with reusable cups.

certainly have pride in taking part in the voluntary scheme,” she adds.

Delay

Foodservice companies face various challenges in complying with this scheme, so a possible delay has been welcomed. In May, a mandatory takeback scheme for single-use cups was omitted from the UK Government’s EPR regulations⁴⁰. The omission does not separate a scheme from EPR, rather “we want to be sure the scheme will deliver the environmental outcomes we are seeking from it”, said Defra at the time.

The department is “still working through” outputs from meetings held in November 2023 with stakeholders affected by the proposed rules, which covered industry readiness and the operability of the policy. The scheme will now be delivered “through different regulation” said Defra but “the exact timing is still to be confirmed”.

This is not an excuse for foodservice companies to dither. As Valpak’s Osman suggests: “Businesses should start to prepare now for mandatory takeback by actively engaging with current initiatives, such as the voluntary National Cup Recycling Scheme membership.”



National cup recycling scheme

The National Cup Recycling Scheme is a pioneering initiative designed to tackle the growing issue of single-use, fibre-based cup waste in the UK. Launched by Valpak, in partnership with major retailers, the scheme aims to create a closed-loop system for disposable cups, which are challenging to recycle due to their plastic lining.

At the heart of the scheme is the Cup Box and Cup Membership Scheme, which invites businesses and retailers to join forces in supporting cup recycling efforts. By becoming members, companies commit to placing cup recycling boxes in high-footfall areas such as coffee shops, offices, and transport hubs. These dedicated bins make it easier for consumers to responsibly dispose of used cups, ensuring they are sent to specialised facilities for proper recycling.

The scheme also focuses on raising public awareness, encouraging responsible behaviour, and making recycling more accessible. By participating in the Cup Membership Scheme, businesses help shift consumer mindsets toward sustainability and adopt the habit of recycling single-use items.

The scheme collaborates with manufacturers, retailers, and local authorities to develop innovative recycling solutions, ensuring the cups collected are transformed into new products. This supports the broader goal of a circular economy, where materials are reused rather than discarded.

Ultimately, the National Cup Recycling Scheme aims to significantly reduce the environmental impact of disposable cups, diverting waste from landfills and promoting long-term sustainable practices across the country.

Final Thoughts

“There is not a single café that isn’t aware of the problem with single-use cups and wants to do something about it.”

George Clark, City to Sea

Cup recycling rates are low – and have been for years – however the trials, investments and improvements made through voluntary schemes lay some of the foundations to ensure that a mandatory scheme can deliver improved rates. The new government’s plans for the proposed scheme are as yet unclear but there is renewed energy at Defra to push through more of the packaging policies that have been promised since 2018.

Industry and NGOs are clearly buoyed too. “There is not a single café that isn’t aware of the problem with single-use cups and wants to do something about it,” says George Clark at City to Sea.

The government’s impact assessment suggests a mandatory cup takeback scheme could boost recycling levels from current levels to almost 40%. That won’t happen automatically – it will require energy, funding, collaboration and consistent messaging, all of which have been missing to varying degrees in voluntary approaches to date.

A mandatory scheme would level the playing field, increasing the number of collection points and making it convenient for consumers to drop their used cups off. This will divert material from landfill and incineration to recycling, generating

GHG emission savings and wider benefits for the environment. Material revenues for reprocessors will increase as more material will be reprocessed. Scale will bring efficiencies and further reduce greenhouse gas emissions (though by how much is currently unclear).

Cost concern

The cup takeback scheme sits under pEPR. Launch dates for takeback are yet to be confirmed but the combined costs of the two interventions are causing concern within industry. Collaboration to ensure the best possible scheme is essential; economies of scale will relieve price pressures too. There needs to be consistency in the cups used and collected, clear and continued messaging through a national advertising campaign, and transparency about what has been achieved.

Those involved and those taking part will want to know that their efforts are making a difference. So too will policymakers, who will be watching data closely as they adjust EPR fees going forward and, if things are not going to plan, consider other regulations. The scope of mandatory takeback may well be widened – the application of a de minimis in previous proposals undermines the policy and creates confusion, say the larger high street

brands – and the threat of a charge on single-use cups looms large.

Scotland is already consulting on a so-called ‘latte levy’ while Mary Creagh, the new Defra minister in Westminster, supported one when she led an inquiry by MPs on the environmental audit committee. “A reusable cup is one of the easiest ways to reduce cup waste but the discounts offered by coffee companies are ineffective,” she said in 2018⁴¹. “The plastic bag charge is proof that charges are highly effective at reducing packaging waste. We urge the Government to introduce a 25p charge on disposable cups.”

More ambitious

Indeed, NGOs and some in the contract catering sector wonder if recycling more cups is an ambitious enough target. They argue that the focus should be higher up the waste hierarchy at reduction and reuse. “I think we need to use myriad tools in the arsenal, of which financial deterrents will be part of the answer,” says Sodexo’s Price. She says the mandatory takeback does help to build the narrative around wider efforts.

“There is certainly further to go,” adds Paula Chin, senior policy advisor (consumption) at WWF-UK, “but we are excited by the prospect of more certainty around some of these key policies”.

About Footprint Intelligence



The ever-shifting sustainability debate makes it vital for businesses to have accurate intelligence to make informed decisions. Footprint Intelligence is Footprint Media Group's research and analysis division, helping companies develop successful strategies in the context of responsible business practices. Footprint Intelligence aims to drive, promote and share best practice by helping industry resolve pressing sustainability issues. It asks tough questions and finds answers. It uses research and industry insight to bring businesses together to identify solutions, opportunities, trends and challenges.

About Valpak



Valpak is the UK's leading environmental compliance scheme, specialising in Extended Producer Responsibility (EPR). Providing simple and innovative environmental compliance solutions to over 4,000 customers in every corner of the globe.

Valpak continues to innovate and grow, now offering additional services to cover wider areas of sustainability, including carbon management, energy management, packaging analysis, and data management - helping companies to meet environmental objectives, mitigate costs and ensure compliance all over the world.

Whether your goals are to achieve legal compliance, maximise your costs savings or improve your environmental credentials, our unique level of expertise in the ever growing field of sustainability means that we can work in partnership with you to find the best possible solution.

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Contributors

Research and writing: **David Burrows**

Editing: **Nick Hughes**

Design: **Trevor Marshall**

About Reconomy



At Reconomy, we help our customers become active contributors of the circular economy. Our vision is to realise a world without waste, where economic growth is decoupled from the consumption of natural resources. Our tech-enabled, people-powered approach makes it simpler and more financially rewarding for businesses to play their part in the circular economy by closing circularity gaps, realising sustainability targets, and solving complex environmental regulatory challenges. Reconomy is building the systems and knowhow that will sustain the economy of the future, empowering businesses to think more circular and harness the full and inherent value of their resources.

REFERENCES

References

1. <https://www.rivercottage.net/news/wake-up-and-smell-the-waste>
2. https://issuu.com/hubbubuk/docs/second_lbe_report_dec_2019_digital
3. <https://www.wrap.ngo/resources/report/single-use-cups-and-go-fibre-composite-food-packaging>
4. <https://foodservicefootprint.com/coffee-cup-scheme-cut-from-epr/>
5. <https://foodservicefootprint.com/packaging-what-to-watch-for-in-2023/>
6. <https://www.cuprecyclingscheme.co.uk/>
7. https://www.bbc.co.uk/food/articles/make_recycling_count
8. <https://foodservicefootprint.com/footprints-five-things-to-know-disposable-cups/>
9. <https://thecpi.org.uk/library/PDF/Public/Publications/Guidance%20Documents/Recyclability-Guidelines-2024.pdf>
10. <https://foodservicefootprint.com/progress-paper-cups/>
11. <https://foodservicefootprint.com/disposable-cup-recycling-group-misses-8-target/>
12. <https://foodservicefootprint.com/the-future-of-foodservice-packaging/>
13. <https://www.tandfonline.com/doi/full/10.1080/14606925.2022.2144474>
14. https://issuu.com/hubbubuk/docs/double_lbe_report_2019_digital
15. https://issuu.com/hubbubuk/docs/how_to_guide_cup_fund_2023
16. <https://www.keepsotlandbeautiful.org/cup-movement/recycle/>
17. <https://foodservicefootprint.com/packaging-what-to-watch-for-in-2023/>
18. <https://foodservicefootprint.com/category/intelligence/reports/page/2/>
19. <https://foodservicefootprint.com/the-friday-digest-stumbling-epr-slim-line-ppwr-and-a-shun-for-uk-cup-takebacks/>
20. <https://foodservicefootprint.com/time-to-ditch-disposables-for-dine-in/>
21. <https://foodservicefootprint.com/plastics-package-scotland-leads-the-charge-on-cups/>
22. <https://www.gov.scot/publications/charging-single-use-disposable-beverage-cups-consultation/>
23. <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england/resources-and-waste-strategy-at-a-glance>
24. <https://questions-statements.parliament.uk/written-questions/detail/2024-07-22/1035>
25. <https://www.gov.uk/government/publications/extended-producer-responsibility-for-packaging-illustrative-base-fees/extended-producer-responsibility-for-packaging-illustrative-base-fees>
26. <https://www.thetimes.com/life-style/article/wheelie-bin-nation-is-all-our-sorting-going-to-waste-pq7tj7kt8>
27. <https://www.endsreport.com/article/1865047/missing-data-businesses-ready-extended-producer-responsibility>
28. <https://foodservicefootprint.com/foodservice-packaging-the-pandemic-changing-perceptions-and-future-progress-in-association-with-kp/>
29. <https://foodservicefootprint.com/reduce-reuse-recycle-why-foodservice-companies-must-press-ahead-with-their-packaging-policies-in-association-with-kp/>
30. <https://www.sciencedirect.com/science/article/abs/pii/S0959652620303413>
31. <https://www.huhtamaki.com/en/highlights/sustainability/taking-a-closer-look-at-the-carbon-footprint-of-paper-cups-for-coffee/>
32. <https://foodservicefootprint.com/unpacking-the-problem-with-life-cycle-analyses/>
33. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063588/epr-final-impact-assessment.pdf
34. <https://www.thegrocer.co.uk/suppliers/epr-scheme-base-fees-unveiled-by-defra/694470.article>
35. <https://www.vegware.com/uk-en/page/faq/#recycling>
36. <https://corporate.marksandspencer.com/media/press-releases/ms-food-launches-first-100-paper-plastic-free-and-easily-recyclable-takeaway>
37. <https://corporate.marksandspencer.com/media/press-releases/ms-aims-most-sustainable-cup-coffee-high-street-fully-recyclable-takeaway-cups>
38. <https://www.gov.wales/changes-workplace-recycling-guidance-workplaces>
39. <https://www.cnn.com/2022/03/15/starbucks-unveils-new-plans-to-eliminate-single-use-cups-encourage-reusable-mugs.html>
40. <https://foodservicefootprint.com/the-friday-digest-stumbling-epr-slim-line-ppwr-and-a-shun-for-uk-cup-takebacks/>
41. <https://committees.parliament.uk/committee/62/environmental-audit-committee/news/100314/mps-call-for-latte-levy-on-coffee-cups/>
42. <https://www.thegrocer.co.uk/news/government-shelves-plans-for-mandatory-recycling-labels-after-opposition-from-europe/695604.article>



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