

360-10

[REDACTED]
From: [REDACTED]
Sent: 07 December 2018 15:16
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Unjustified proposals on tethered caps – same deadline for juice and milk cartons as for fizzy drinks bottles

[REDACTED]
See below concerns from Tetra Pak.
[REDACTED]

From: [REDACTED]
Sent: 07 December 2018 15:15
To: 'Landeg Gavin'; [REDACTED]
Cc: [REDACTED]
Subject: RE: Unjustified proposals on tethered caps – same deadline for juice and milk cartons as for fizzy drinks bottles

Gavin

Thanks for below. Your concerns below have been communicated to our Permanent Representative handling this dossier in Brussels

However, as you are aware, negotiations are at an advanced stage. As I understand the situation, there is very little scope for major changes at this point in time.

Regards

[REDACTED]
[REDACTED]
Waste Policy and Resource Efficiency

Roinn Cumarsáide, Gníomhaíthe ar son na hAeráide & Comhshaoil
Department of Communications, Climate Action & Environment
Bóthar an Bhaile Nua, Loch Garman, Y35 AP90
Newtown Road, Wexford, Y35 AP90

[REDACTED]
[REDACTED]
From: Landeg Gavin [REDACTED]
Sent: 07 December 2018 08:43
To: [REDACTED]
Subject: Unjustified proposals on tethered caps – same deadline for juice and milk cartons as for fizzy drinks bottles
Dear [REDACTED] Dear [REDACTED]

In reference to the latest Council's text for discussion, we note that plastic bottles for carbonated drinks would have an extended deadline for tethering caps of 5 years instead of 3 years from the entry into force (Amendment 76 - Article 17 – paragraph 1 – subparagraph 2).

1 We ask for the same extended deadline for beverage cartons as for plastic bottles for carbonated drink

Brand owners normally use carton packages for products such as milk, juice, soups, etc. Products with a high nutritional value compared to soft drinks. These products are much more sensitive than carbonated soft drinks and put more severe requirements on the package to ensure the integrity and safety of the product. Caps on plastic bottles for carbonated drink has as a primary task to keep carbonic acid in the bottle. Caps on aseptic cartons, as the packaging material itself, must protect nutrients of products for up to 12 months. Our current caps cannot be modified, they require a total redesign and food safety validation. Our industry needs time to redesign and to make the necessary investments. For this reason we find it essential that carton packages, as a minimum, are treated equal to plastic bottles for carbonated drinks.

2 We ask for tethered cap requirements to be limited to 'on the go packages' and thus only to beverage cartons of 500 ml or smaller

The suggested wording on what type of packages to involve is inconsistent with the objective of the Directive. With the argument that "they are not among the top littered plastic items" (Amendment 10 - Recital 7) glass bottles ranked 14 and beverage cans ranked 29 of littered items found on Europe's beaches (see Commission [Impact Assessment](#), p.31-33) are exempted from the requirement of tethered caps. This argument falls flat as the proposal includes beverage cartons which is ranked 81 in the same Assessment study. For this reason and for reason for fair treatment we encourage you to exclude also beverage carton or as a minimum limit the requirement to packages below 500ml, so called 'on-the-go' or 'out of home' packaging sizes. Less than a quarter of the beverage carton packages sold in Europe are below 500ml and could therefore potentially contribute to littering.

Both modifications would in our view also be needed to ensure fair competition among packaging material sectors.

Thank you and best regards

Gavin

Gavin Landeg

Head of Environment North West Europe

Tetra Pak

Environment North West Europe

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