



# Public Consultation Submissions & Responses

## Intent and Objectives: Guidelines for Catering Establishments on Different Alternatives to Single-Use Plastic (SUP) Food Containers and Cups for Beverages

July 2024

Environment & Resources Authority



## CONSULTATION FEEDBACK

Ref No.	Name of Stakeholder / Date	Comments Received	Response / Remarks
1	Biriyani Haven 09/07/2024	<p>The main issue is that there's no feasible, tangible solutions that the state has undergone. The state of Malta should effectively incentivize and completely support reusable packaging and green containers.</p> <p>I have takeaway bags that's made completely from cloth wastes from fashion industries and Takeaway boxes completely made from palm leaves. But I received 0 support from the state, so where's my motivation to keep doing this ?</p>	This comment will be taken into consideration during discussions with the relevant entities.
2	Afro deli and coffee 19/07/2024	I was wondering if there would be any economic support to the restaurants making use of these containers.	This comment will be taken into consideration during discussions with the relevant entities.
3	Friends of the Earth 29/07/2024	<p>In order to reduce the amount of waste being directed to Maltese landfills, regarding Guidelines for Catering Establishments on Food Containers, Malta must strive to follow the waste hierarchy as described in the European Union's Waste Directive,<sup>1</sup> first and foremost reducing/avoiding use of plastic, secondly reusing where possible, and third, recycling.</p> <p><sup>1</sup> <a href="https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en">https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en</a></p> <p>Reduce/eliminate: The guidelines should encourage choosing food containers that are made of non-plastic material such as metal, glass, or paper.</p> <p>Reuse: The guidelines should encourage use of reusable cups such as ceramic mugs when beverages are meant for consuming on-site, so that disposable cups are only used for take-away purposes. Many large scale events around Europe have banned single use plastics and use reusable cups instead. One shining example is the City of Ghent, which has consciously opted for waste-free festivities and has banned disposable cups. Reusable cups have therefore become standard and can be borrowed from the municipal waste department.</p>	<p>Comments noted and will be taken into consideration when drafting the guidelines.</p> <p>As a general note, the Authority would like to highlight that in line with Article 4 of the Single-use Plastic Directive, as well as the principles of the EU Waste Directive, the guidelines in question will indeed prioritize:</p> <ul style="list-style-type: none"> <li>• <b>The reduction/avoidance of waste:</b> The aim of the guidelines is to encourage catering establishments to minimize the use of single-use plastics products (mainly food containers and cups for beverages) by adopting practices and materials that inherently reduces the</li> </ul>

	<p>In addition, event organisers have to submit a detailed waste management plan to the city authorities.<sup>2</sup> Such practices also contribute to reduced GHG emissions when taking into consideration the whole lifecycle<sup>3</sup>. Such an approach should be adopted in Malta, and training and support provided to events and festival organisers, including the festa committees. An example of reuse is the system of cup returns being implemented in Freiburg, Germany.<sup>4</sup> There, the city's waste management company provides cups to cafes for which customers pay a €1 deposit, and the deposit is returned when the customer returns the cup to any participating cafe.</p> <p>2 <a href="https://www.belganewsagency.eu/significant-reduction-in-waste-at-events-thanks-to-reusable-cups">https://www.belganewsagency.eu/significant-reduction-in-waste-at-events-thanks-to-reusable-cups</a></p> <p>3 <a href="https://zerowasteeurope.eu/wp-content/uploads/2023/09/Assessing-the-Climate-Impact-Reusable-systems-vs.-Single-Use-Takeaway-Packaging-v-2.2.pdf">https://zerowasteeurope.eu/wp-content/uploads/2023/09/Assessing-the-Climate-Impact-Reusable-systems-vs.-Single-Use-Takeaway-Packaging-v-2.2.pdf</a></p> <p>4 <a href="https://zerowasteeurope.eu/wp-content/uploads/2018/09/FreiburgCupfinal.pdf">https://zerowasteeurope.eu/wp-content/uploads/2018/09/FreiburgCupfinal.pdf</a></p> <p>Recycling/Biodegradables: Where eliminating or reusing plastic is not possible, catering establishments should be directed to favour providing take-out food containers that are recyclable given the current recycling technology being utilised by the Maltese Islands. For example, if aluminium containers are offered, these have the potential to be recycled if placed in the grey bag. From there, Malta's recyclables are collected and brought to the Material Recovery Facility (MRF) for recycling (usually sent abroad). The requisite public education must be conducted in order for catering establishments and their customers to recognize these products as recyclable and sort them accordingly.</p> <p>There are alternatives to plastic clamshell take-out containers that are made of cardboard/paper, which are technically biodegradable. However, if these are placed in the black bag waste stream, they will be sent to a landfill, being that landfills are regularly layered over materials may not receive the adequate amount of oxygen necessary for bacteria to break them down. Similarly, if guidelines require that food containers are certified compostable (various independent organisations provide such certifications, such as Biodegradable Products Institute), this is a worthy goal. However, as long as Malta lacks the facilities to process compostable food containers into compost, they will be sent to the anaerobic digester within the Mechanical Biological Treatment Plant (MBT).<sup>5</sup> Anaerobic digesters are helpful in that they divert waste from landfills,</p>	<p>need for such items. This includes promoting the use of reusable products, providing alternative materials with less environmental impacts and advocating for practices that eliminate unnecessary packaging.</p> <ul style="list-style-type: none"> <li>• <b>Reuse:</b> The guidelines will highlight the best single-use non-plastic (SUNP) options for catering establishments, as well as ways to integrate reusable alternatives, including reusable systems, where feasible.</li> </ul> <p>The guidelines will take into consideration present and future characteristics of the Maltese waste management system. It will also include practical advice and case studies to assist catering establishments in transitioning to these more sustainable practices. By adopting this comprehensive approach, the Authority aims to support Malta's commitment to reducing overall waste generation and further protect our surrounding environment.</p>
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	<p>and can produce energy and/or fertiliser. However, due to harmful emerging contaminants such as Perfluoroalkyl Substances (PFAS) sometimes being used on compostable food containers,<sup>6</sup> there is potential for digesters to produce end products that contain concentrated levels of pollutants which should not be spread on soil until adequate safety testing shows that they do not exceed health standards.</p> <p>5 <a href="https://thinkmagazine.mt/where-does-it-go-a-snapshot-of-waste-management-in-malta/">https://thinkmagazine.mt/where-does-it-go-a-snapshot-of-waste-management-in-malta/</a></p> <p>6 PFAS has been banned via an agreement between the EU Parliament and the Council on the Regulation on Packaging and Packaging Waste for contact-sensitive food packaging by 2026. <a href="https://www.europarl.europa.eu/news/en/press-room/20240301IPR18595/deal-on-new-rules-for-more-sustainable-packaging-in-the-eu">https://www.europarl.europa.eu/news/en/press-room/20240301IPR18595/deal-on-new-rules-for-more-sustainable-packaging-in-the-eu</a> and <a href="https://www.reneweuropegroup.eu/news/2024-03-04/packaging-deal-renew-europe-succeeds-in-eliminating-pfas-chemicals-from-contact-food-packaging">https://www.reneweuropegroup.eu/news/2024-03-04/packaging-deal-renew-europe-succeeds-in-eliminating-pfas-chemicals-from-contact-food-packaging</a></p> <p>In place of compostable single-use containers, there are companies that provide reusable take-away containers that can be cleaned and reused, such as Happy Co.<sup>7</sup> This has applications for catering events, cafeterias, and festivals.</p> <p>7 <a href="https://happy-compagnie.com/en/sustainable-reusable-solutions-for-events-and-large-gatherings/">https://happy-compagnie.com/en/sustainable-reusable-solutions-for-events-and-large-gatherings/</a></p> <p>Finally, the guidelines should also make very clear what types of materials are included and not, and communicate clearly how they should be used and recycled (with which waste stream), so as to avoid misuse and confusion. We also suggest reviewing the materials provided by Zero Waste Europe as a resource: <a href="https://zerowasteurope.eu/resources/library/">https://zerowasteurope.eu/resources/library/</a>.</p> <p>Friends of the Earth Malta would like to thank the Ministry for this opportunity to comment, and look forward to working with you to reduce waste in Malta.</p>	
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