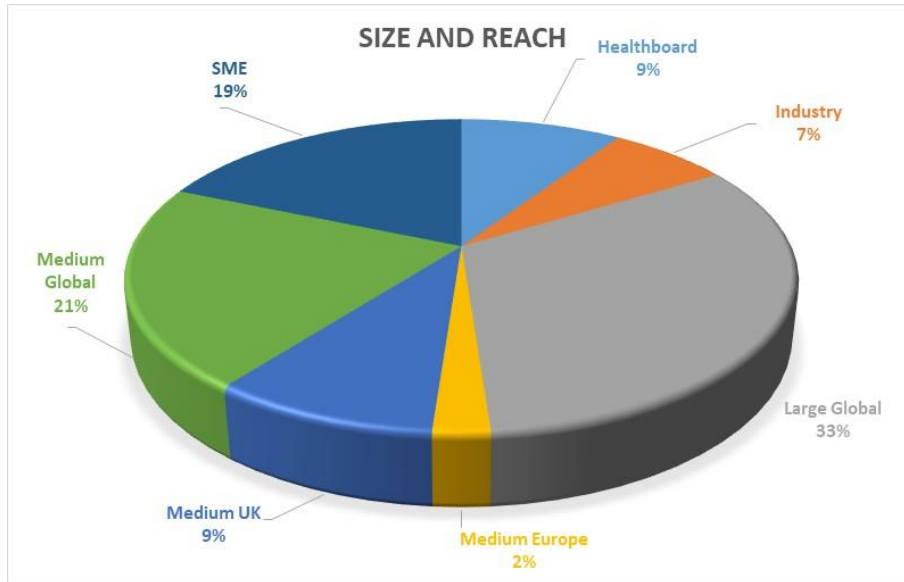
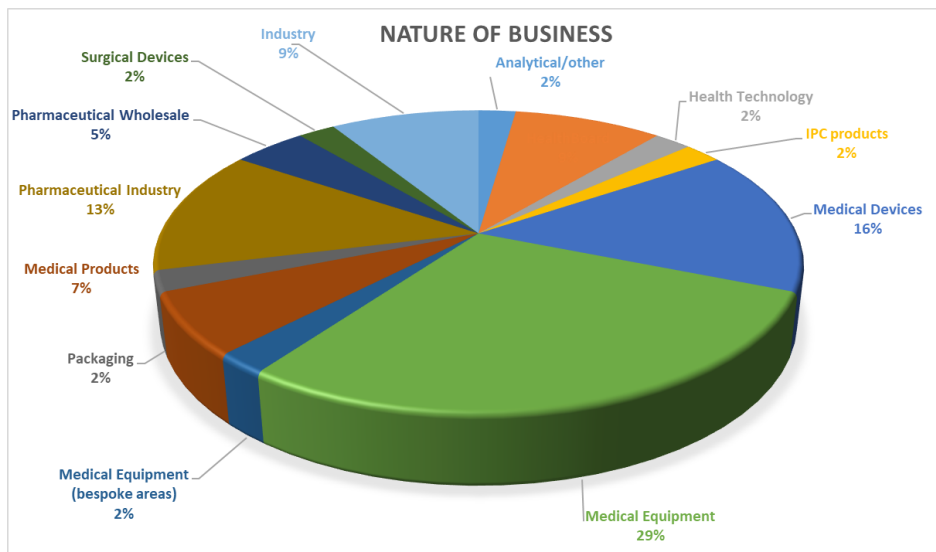


High Level Analysis Plastics Consultation

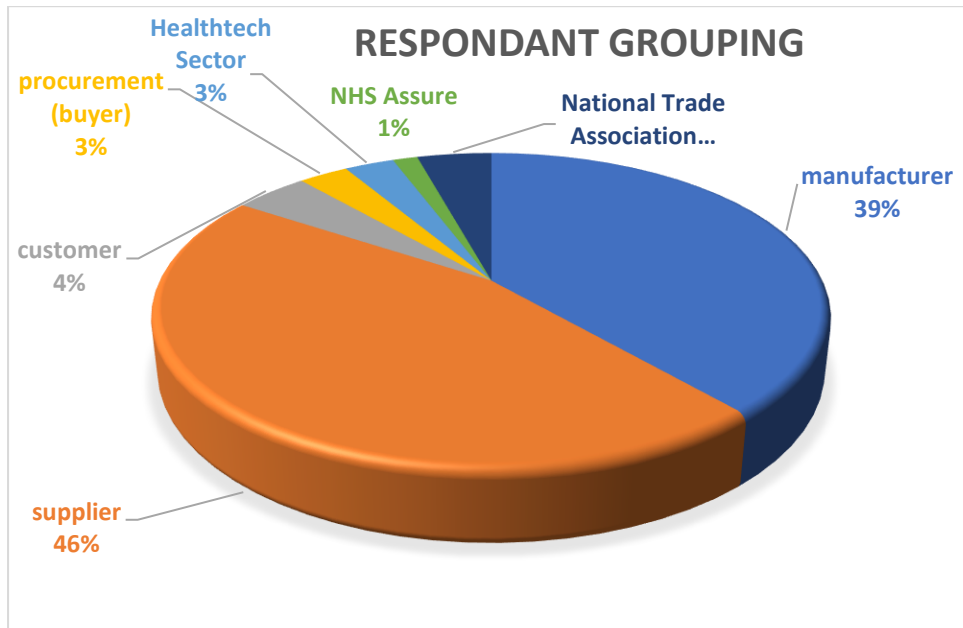
Company Size and Reach: (duplicate entries removed)



Area of business: (duplicate entries removed)

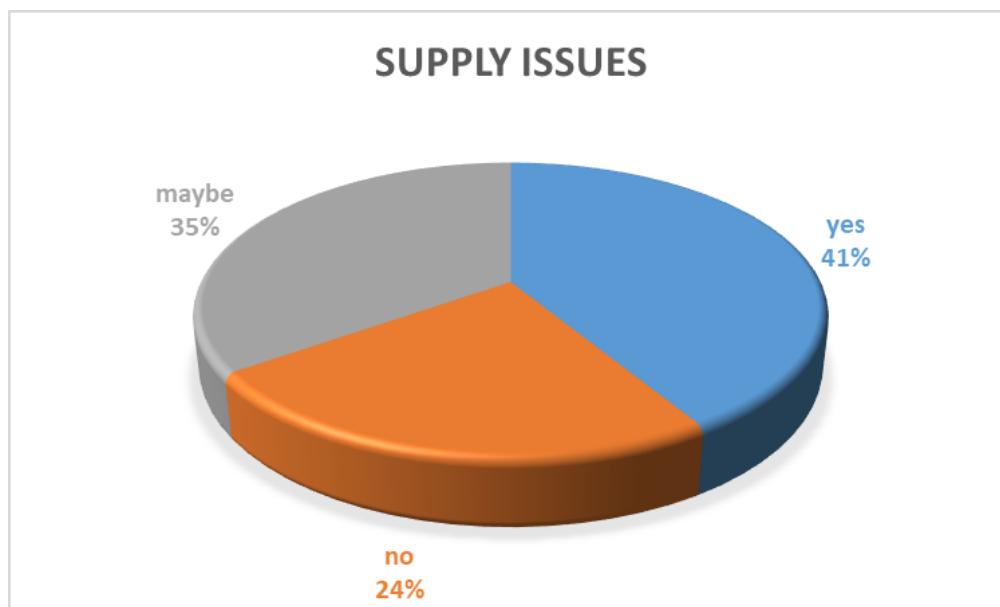


Question 4. What general group are you responding on behalf of (you may choose more than one)



Question 5. Do you consider there to be any significant impacts to the supplier or supply chain, in relation to mandating recyclable / re-usable plastic packaging?

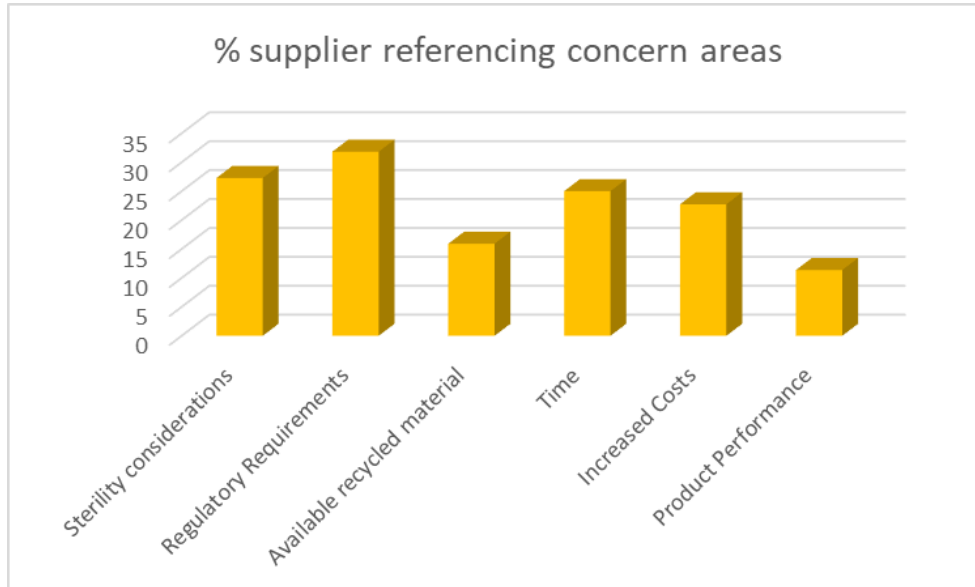
Summary of responses



It was noted that mainly those who thought it wasn't a big issue for the supplier answered with a clear 'no' response. Most other responses either were caveated or largely text, which added value through information sharing however made clear conclusion on their view more complex.

A quick tally of the main concerns showed that regulatory requirements and sterility of items were main factors preventing / limiting inclusion of greater recycled content. This was perhaps reflective of a large in distinguishing between primary / secondary and tertiary packaging in our paper.

Some respondents mentioned that options on tertiary or distribution packaging is reasonable.



Cost and availability of recycled material content seemed to be mentioned as both considerations for suppliers and customers.

Perhaps more positively was the fact that around 5 of the companies responding were implementing some of these changes already and did not see this as a barrier.

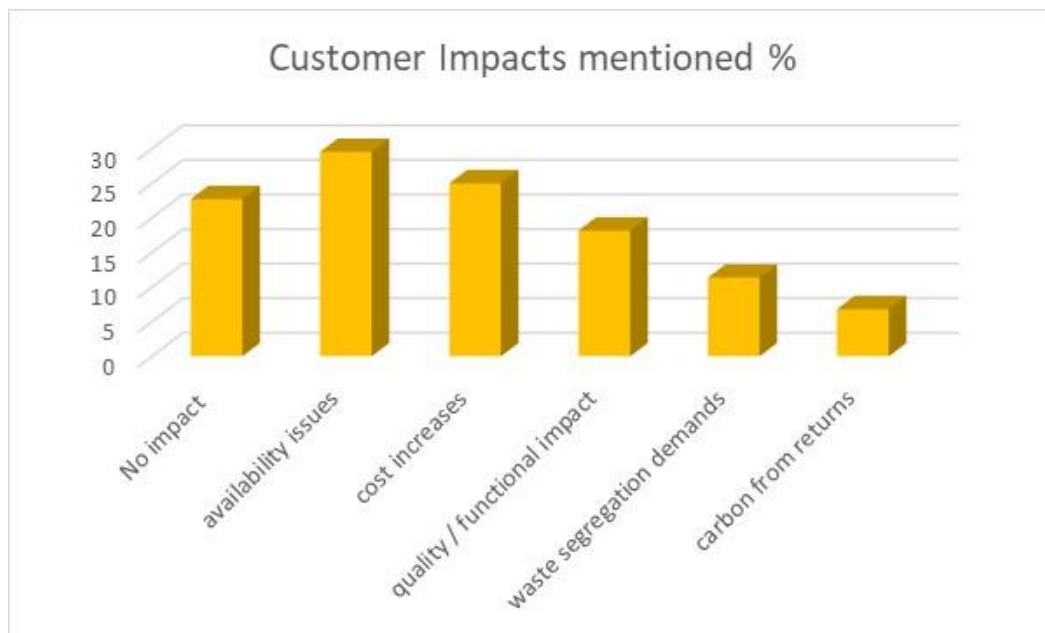
Other key points raised:

- Need to use existing stock and relabel dependent on time scales – could incur cost
- Emissions impact of any return logistics schemes
- Moisture barrier factor needed in some products which determine materials used
- Need for innovative solution – but also reflected that changes could drive innovation
- Need for regulatory change
- Potential supply chain disruption or disadvantageous supply to Scotland if changes were made out with UK norm
- Requirement under regulation to use Virgin plastics

The pharmaceutical industry has specific concerns as they are heavily regulated. It is worth consideration that all packing in contact with pharmaceuticals must be incinerated so recycling of any materials from this would not be possible.

Question: 6. Please detail any anticipated impacts to the customer experience in relation to mandating recyclable / re-usable plastic packaging?

Summary of responses



Reflecting on the previous impact to supplier question, there seem to be some suggestion that any mandated changes would leave Scotland as an outlier and potentially affect supply chain / availability to Scotland. Increases to supplier costs would have knock on costs for customers. There were several references to decreased quality / functionality with unintended consequences such as time delays where items such as easy open / tear packaging may not perform the same. This could impact times in theatres and medical provision areas. Lack of clear transparency on devices or items were mentioned – this could inadvertently increase waste if items are incorrectly open as they cannot be clearly determined in the packaging.

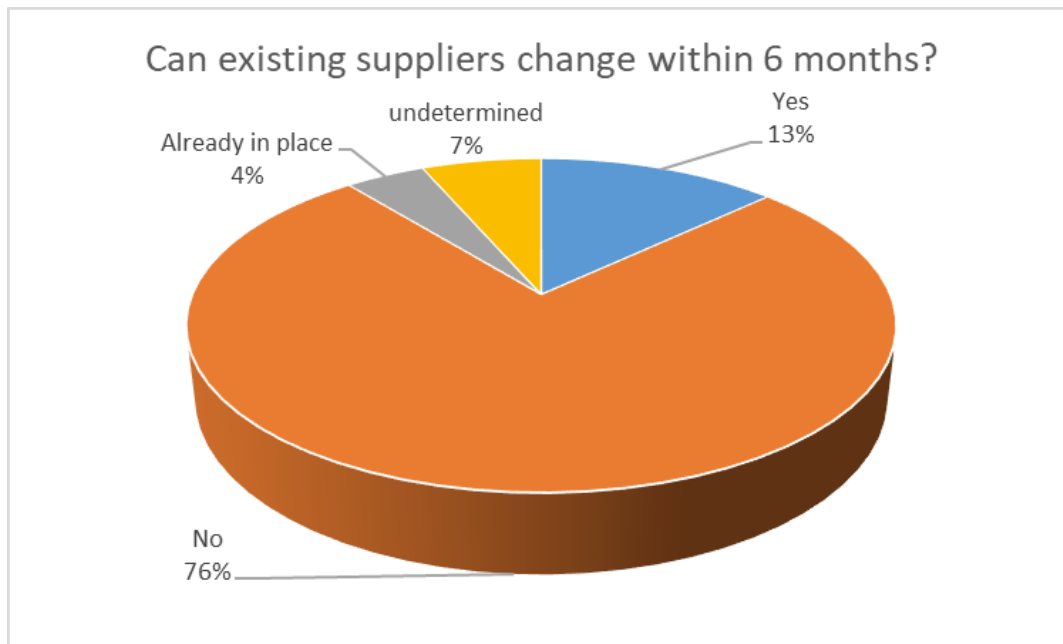
Some sustainability benefits for Health Boards were referenced but these considered reputational aspects mainly and not quantifiable impacts. The needed for improved and greater waste segregation to make the recovery of the plastics viable was mentioned. This highlights the need for efficient waste segregation at boards to be a clear enabler / driver.

Question 7. Would incorporating the requirement for recyclable plastic packaging into current contracts within a six-month period be feasible?

We welcome dialogue on the challenges / opportunities

Summary of responses

This was overwhelming a 'no' on behalf of most respondents. A quarter of those that said 'yes' were from HB representatives.



Main reasons cited were the need to adapt for global markets as well as cost time and regulatory pressures cited in previous answers. Several mentions were made in this and previous answers relating to current stock requiring time to be utilised which may not occur in the existing or proposed timeframes.

Some suppliers offered alternative views on what they considered to be a reasonable timeframe, these included:

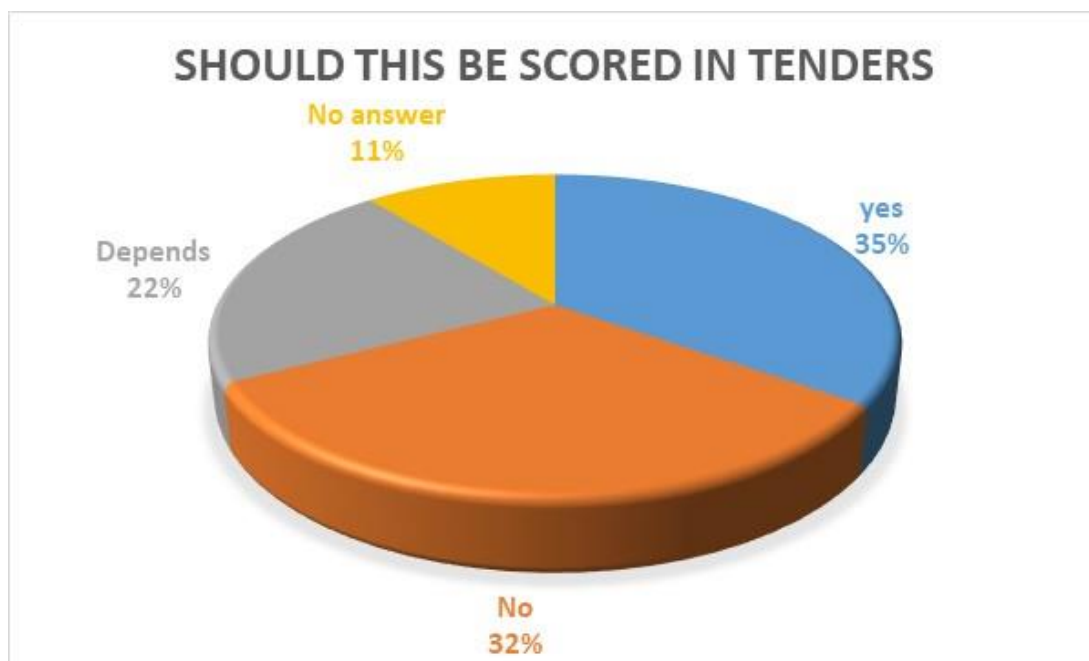
Timeframe for change	
12 -24 Months	5
2 Year minimum	2
3-5 Years	1
6-8 Years	2

Question 8. To account for the environmental value of our products, we may consider tender scoring in relation to plastic packaging proposals.

Would scoring on aspects such as recycled content of packagin...

Summary of responses

Perhaps surprisingly given previous answers, there does appear to be a support for scoring elements such as recycled content in tenders. There were a reasonable percentage more that considered that this could be developed but should be appropriately timed and consulted with the market.

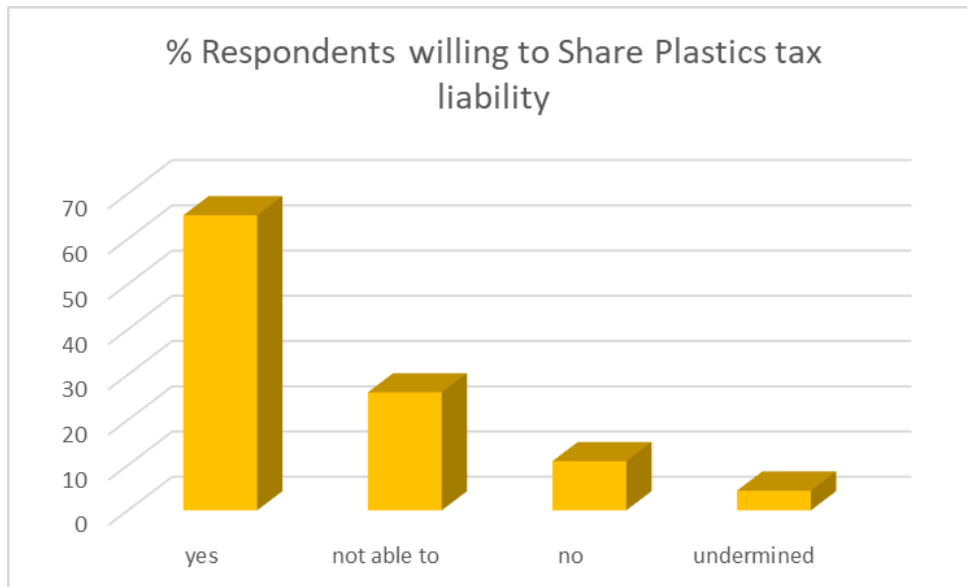


Inclusion of scoring on aspects such as this were felt to be positive drivers of change by some respondents. This would need to be balanced against supply risk, as it was still clear that interventions or changes would affect supply to Scotland, especially where this differed from wider economic area practises.

Question 9. Are suppliers able to, and in agreement with sharing their plastic tax obligations?

Summary of responses

There appears to be support for sharing plastics liability by many of the respondents, with just under a third stating that they were not able to. There was the option for respondents to provide multiple answers. It appeared that only one provider stated 'no' and 'not able to', whereas two stated 'yes' and 'not able to'.



Question 10. If you have indicated that you are not able to share your plastic tax details, please tell us why.

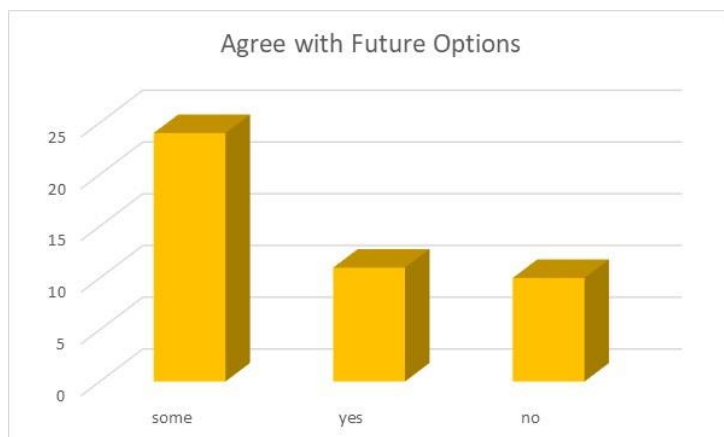
Summary of responses

There were not convincingly any notable patterns in the answers of these, however it was noted that several either referred to sharing it under legal obligation only, or not sharing it due to confidentiality purposes. Several SME were not able to share these details as they did not meet threshold liabilities and did not incur this tax.

Of the respondents, only four companies specifically said 'no' as their only answer and only two provided reasons for this. (one regarded confidentiality and the other reason cited that it was manufacturer and supplier responsibility so were unclear around reasons for this).

Question 11. Do you agree that the future considered options, outlined in Section 29 of the proposal, are reasonable next steps?

Summary of responses



Most respondents agreed with some or all the options. When considered in relation to the reticence to current proposals and timeframes for existing suppliers to change, this would support the premise that the current timelines and proximity of intended change are bigger considerations compared to the changes themselves. There appears to be a market demand to follow a global or at least UK pace of change around these aspects to streamline costs and not disrupt the supply chain.

Question 12. Please tell us a little more about why you answered Question 11 with your chosen option

If 'No' Please include any details of what you would consider as reasonable steps that NHS Scotland could t...

Summary of responses

Any responders suggested that reverse logistics / return of packaging was not optimal over local recycling due to incurred transport miles. Other responses referenced the timing of any such changes and working with suppliers to look at what was possible regarding change. The need for change and aspirational changes were generally supported. Several comments were clear on the need for alignment with wider UK and referenced using Evergreen as per NHS E.

Question 13. Are there any other details that you wish to share with us in relation to this consultation process and / or the proposals under consideration?

Summary of responses

Many of the replies, where these have been detailed include, points already made. Key themes are:

- Timings and time to change
- Alignment with UK NHS in devolved nations – using Evergreen
- Engaging with companies around specific sustainability improvements
- Wider sustainability and not a defined focus on plastics