

EASTER EGG PACKAGING: ANNUAL PROGRESS REPORT 2011



Jo Swinson MP

Top Findings

The study has found:

- Mars and Cadbury have reduced the size and weight of their packaging compared with 2010, making them the most improved.
- Just as last year, Guylian have produced the most excessively packaged Easter egg, although a more efficiently packaged product is being introduced this year.
- Nestle is still the only company whose Easter packaging is 100% recyclable. Both Mars and Cadbury have removed plastic inserts in their boxes, however the majority of products sampled still contain plastics or other non-recyclable materials.
- Since the first report in 2007, Easter egg packaging efficiency and recyclability has, on the whole, improved. 2009 saw the largest packaging reduction drive but that rate of improvement has slowed this year and last.

Excess packaging continues to be a problem across many products. Easter eggs have typically been among the worst examples, but since the inaugural report in 2007, packaging efficiency has improved. This year's study has analysed 13 eggs, and draws comparisons with these and ten eggs which were also surveyed between 2007 and 2010, including major manufacturers' products and supermarkets' own brands. The dimensions and weights of the eggs and their packaging have been measured, packaging material examined and environmental information recorded.

Since 2009, when there was a marked improvement in Easter egg packaging, analysis reveals a slow yet steady improvement in terms of average weight of packaging. The average total weight of packaging for an Easter egg in 2009 was 52.8g, decreasing to 49g in 2010, and this year the figure stands at 51g.

There has also been a small improvement in box efficiency, evident in the average volume of egg to packaging. On average, Easter eggs in 2009 took up 39.8% of the volume of their packaging - the best figure since the study began in 2007. Over the past two years percentages have been fairly steady at 36% in 2010 and 38% in 2011. This improvement in overall average percentage can be attributed

mainly to a 20% increase in the efficiency of Cadbury's box and does not reflect the fact that most boxes and eggs are similar to 2010.

The overall trend is encouraging, with Mars and Cadbury taking steps to reduce the size of their boxes and Guylian introducing a more streamlined box to replace the product in this study. As with last year improvements in the figures for efficiency of packaging and weight of packaging have been small but noticeable nonetheless. However, progress is slow and although some manufacturers are improving product packaging, the majority of products have made no alterations to their packaging over the past 12 months.

Last year's report observed a slight improvement in the percentage of products specifying whether their packaging material was made from recycled resources. This year, three eggs failed to include any recycling or environmental information – House of Commons, Baileys and Tesco. Whilst only five out of 10 products in 2010 provided a breakdown of which packaging parts could be recycled, this year 6 of the 10 contain this information. Moreover, due to Sainsbury's and Cadbury's improving the recyclability of their products, the average percentage of recyclable packaging has improved over the past year.

Today's Easter egg packaging contains more guidance on recycling and environmental information than in 2007's initial report and companies are working towards ensuring that all materials are recyclable. Despite this, Nestlé's packaging remains the only product surveyed where materials are 100% 'widely recycled' and 6 of the 10 products surveyed both this year and in 2010 continue to use materials which have to be disposed of in landfill. In order to improve, emphasis should be placed on tackling this issue in a way that will ensure all materials are recyclable as well as reducing the amount and weight of packaging.

2011 League Table

Rank	Highest volume of egg to volume of packaging ratio (2010 rank)	Recyclability
1	Sainsbury's (1)	Nestlé
2	House of Commons (2)	Mars
3	Green & Black's (4)	Sainsbury's
4	Cadbury (9)	Green & Black's
5	Marks and Spencer (5)	Cadbury
6	Thorntons (4)	Tesco Finest
7	Mars (8)	House of
		Commons
8	Tesco Finest (6)	Guylian
9	Nestlé (7)	Baileys
10	Bailey's (10)	Thorntons
11	Lindt (11)	Lindt
12	Guylian (12)	Marks and
		Spencer

Notes on results above:

In the 'highest volume of egg to volume of packaging ratio' column, the volume of the egg has been used rather than the volume of all edible contents because in most cases the other contents could be put inside the egg. For Thorntons, the brand's ranking was worked out from an average of the measurements of their supermarket and shop-bought eggs.



www.joswinson.org.uk

Background

Every year in the UK, millions of tonnes of packaging waste are generated. Not only does packaging cost money for manufacturers to produce, but the environmental costs are extensive: its disposal contributes significantly to greenhouse gas emissions. Moreover, a survey conducted by DEFRA in 2010 found that 82% of participants thought that packaging waste is more of a problem than food waste¹.

In 2008 the UK disposed of an estimated 10.7 million tonnes of packaging waste, of which around 65% was recovered. When compared to the fact that only 27% of packaging waste was recovered in 1998², this illustrates that a considerable amount of progress has been made.

In order to continue this upward trend and minimise the amount of non-recyclable materials in landfill sites, companies must take steps to improve their environmental credentials. Companies need to commit steps to reduce carbon dioxide emissions associated with the whole life cycle of packaging materials: encouraging consumers to recycle with informative logos and information; redesigning packaging by incorporating eco-design values; incorporating a greater proportion of recyclable materials, and recognising they have a duty to ensure that packaging optimisation is met.

UK packaging recycling targets are underpinned by European Commission Directive 94/62/EC. In the UK this is implemented through the Producer Responsibility Obligations (Packaging Waste) Regulations 2007, managed by the Department for the Environment, Food and Rural Affairs (DEFRA), and the Packaging (Essential Requirements) Regulations 2003, managed by the Department for Business, Innovation and Skills (BIS).

DEFRA's regulations are founded on producer responsibility, requiring companies with large turnovers and handling more than 50 tonnes of packaging a year to make a proportional contribution towards the UK's responsibility to recycle packaging. However the business recycling obligations for card, paper and plastic in 2011 and 2012 remain stagnant, with card and paper set to stay at 69.5% and plastic at 32%³.

The results of DEFRA's Review of Waste Policies in England, due to be published in May, should alter these targets. The preliminary findings will focus on the disposal, reuse, prevention, and recycling of waste, ensuring that companies and manufacturers meet EU targets.

The UK has met or surpassed most of the packaging recycling and recovery targets that Member States had to achieve by December 2008. From 1998 to 2009, recycling targets have diverted 6.6 million tonnes of packaging waste from reaching landfill sites, and prevented 8.9 million tonnes of CO2 emissions from entering the Earth's atmosphere⁴. However these past achievements should not result in complacency looking ahead. Businesses, consumers and government departments

¹ http://www.defra.gov.uk/statistics/files/defra-stats-food-pocketbook-2010.pdf

² http://archive.defra.gov.uk/environment/waste/producer/packaging/index.htm

 $^{^3~}http://archive.defra.gov.uk/environment/waste/producer/packaging/index.htm\\$

 $^{^4\} http://archive.defra.gov.uk/environment/waste/producer/packaging/documents/excec-summary-pack-strategy.pdf$

should endeavour to collaborate as a matter of urgency to further reduce excess packaging's effect on the environment. The UK continues to lag behind European countries in terms of recycling and recovery performance, with Denmark, Luxembourg and Belgium coming out on top⁵.

The Courtauld Commitment's second phase was launched in March 2010, which aims to improve resource efficiency and reduce the environmental impact of the grocery retail sector. The voluntary agreement's first phase prevented 1.2million tonnes of food and packaging waste between 2005 and 2009⁶. Phase two is targeting a 10% reduction in carbon impact of grocery packaging by 2012⁷. Since last year's Easter egg report was published, Tesco and Marks and Spencer have added their names to the list of 47 other companies involved.

The issue of excess packaging and waste is certainly not confined to Easter eggs and affects most industries. Likewise, addressing the amount of CO2 being emitted into the atmosphere cannot be eliminated by tackling packaging alone. However given that the Easter egg season occurs only once a year over a matter of weeks, it is interesting to see what actions companies are taking year-on-year, to reduce packaging and increase recyclability.



⁷http://www.wrap.org.uk/retail_supply_chain/voluntary_agreements/courtauld_commitment/what_are_the_targets.html

www.joswinson.org.uk

http://archive.defra.gov.uk/environment/waste/producer/packaging/documents/full-packaging-strategy.pdf http://www.wrap.org.uk/retail_supply_chain/voluntary_agreements/courtauld_commitment/phase_1/index. html

Packaging Reduction Plans and Marketing

Nestlé are keen to stress their use of responsibly sourced palm oil and a new partnership with The Forest Trust, which will see an effort to only use products without a deforestation footprint. They claim to be the first major confectionery company to remove plastic inserts from 80% of their eggs (200 million eggs). They also claim to have cut packaging across their Easter egg range by an average of 30%, resulting in over 700 tonnes less waste being sent to landfill. By 2012 they aim to remove plastic inserts from all of their eggs.

Tesco have reduced packaging for their own brand by 15% since 2007, saving 100,000 tonnes of packaging in the process. Their Easter egg packaging policy is designed to ensure that they use the lightest materials from sustainable sources with the lowest carbon impact and give consumers every opportunity to recycle the product. However the Tesco Finest egg analysed in this report was not forthcoming with this information as the box provided no recycling or environmental guidance.

Lindt's website states that the company are committed to "environmental aspects by reducing packaging size and using predominantly recyclable materials but at the same time maintain the product's premium character of packaging and the quality aspects of product protection". Last year, Lindt sold 4.1 million gold bunnies, whose packaging is just 4g of a 200g product. While the product in this study accounts for just 15% of Easter sales the more economically packed gold bunny represents 50%, making it the company's biggest selling product.

Mars have reduced the amount of plastic in Easter eggs by 35% with all remaining Easter egg packaging now 100% recycled cardboard. The company's 2011 focus is to ensure that packaging on Galaxy eggs contains information on their cocoa sustainability commitment and work with the Rainforest Alliance.

Cadbury's claim their average packaging weight across their mid-range eggs has decreased by 50% since 2006. Thermoform plastic has been removed this year, making it more widely recyclable for consumers.

Guylian are in the process of a radical overhaul of packaging policy, introducing a new triangular box. This will see a 70% reduction in packaging volume, a 21% increase in the percentage of egg volume to packaging and a reduction in cardboard weight of 42%. However, a number of Easter 2010 products remain on the shelves this year, which is why we have not observed any improvement.

Thorntons have improved their manufacturing efficiency since 2010, saving 7.11 tonnes of packaging. Like-for-like comparisons with last year show reductions in packaging across the premium and treat egg range. The company predicts modest progress for the 2012 season.

Since 2007, **Marks and Spencer** has reduced Easter chocolate packaging by 45%. They now believe the optimum balance between packaging and product is being met.

Using 2009 as a baseline, **Sainsbury's** aim to reduce packaging by 33% - one of the UK's leading reduction targets. By replacing heavier materials with lighter materials the company claims to have reduced packaging by 57% since 2008.

Over the last 12 months, **Kinnerton** has diverted 80% of its waste from landfill for reuse or recycling. The company's kids' Easter egg sells over 2 million products per year, and within this range they have reduced packaging weight from 37% in 2009 to 33% this year.

Good Practice

As an example of good practice, Montezuma's Eco Easter egg is included in this year's study because of its innovative design that uses sustainable raw materials whilst satisfying regulation criteria. The outer shell, made from 70% post industrial recycled corrugate, is light, compostable and completely protective of the contents. Hopefully creative design and product innovation of this nature will contribute to a greater number of manufacturers moving towards more lightweight, responsibly sourced and recyclable packaging strategies.





Meanwhile, Lindt's gold bunny has again raised questions over the packaging policy of the company's midrange egg, as there is just a 15g difference between the chocolate products, but a vast variation in volume of packaging.

Direct comparisons

Easter egg	Change in packaging 2010-2011
Mars	Substituted plastic inner tray with one made of card. Mars have reduced the total weight of packaging meaning the chocolate accounts for more of the overall weight of the product. Improvements can still be made in order to reach the average % of egg to volume of packaging.
Green & Black's	Green & Black's have chosen to retain the resourceful triangular packaging first introduced in 2009. Packaging material derives from responsible sources through connections with the Organic Soil association and the Forest Stewardship Council.
Lindt	Lindt's Easter egg box continues to be one of the least efficiently packaged in our study, with no improvement from 2010. The egg remains one of the worst performers in terms of % of edible contents to total weight and also volume of egg to volume of packaging. Limited recycling information is still an issue.
Cadbury	Cadbury have cut the size of its box resulting in an improvement in ratio of chocolate to packaging and in percentage of edible contents to weight. This has been achieved by an impressive 20% improvement in terms of egg to packaging and reducing packaging across their range by an average of 13% compared with 2010. They have also replaced the plastic inner tray with card making the product more recyclable.
Sainsbury's	Plastic packaging is now widely recyclable and this has had a huge impact on the recyclability percentage of the product. As for the dimensions and weight of packaging and egg, these remain unchanged.
Thorntons	The Thorntons supermarket egg measured in this report has changed back to a cuboid box from the triangular prism shaped box sold in 2010, therefore for comparison over time purposes, the percentages are an average of the shop bought egg of 2011 and the 2010 Supermarket egg as these most closely resemble products analysed in the past. The change in box shape has had a negative effect on % of egg to packaging and weight of edible contents to total weight although they are still roughly average.
Guylian	The Guylian product sampled here is the 2010 product, keeping them at the bottom of the league table for both edible contents to weight ratio and volume of egg to box ratio. The egg is similar in dimension to the 2011 average, however the packaging continues to be one of the largest on offer.
Marks and Spencer	Packaging now provides a breakdown of recyclable components. No other noticeable difference to packaging over the past 12 months.
Nestlé	Remains the only product in the study to be 100% recyclable. No notable changes to packaging.
House of Commons	Packaging for this egg has remained the same as 2010. Although the wrapper fits tightly around the egg, it is still comprised of non-recyclable cellophane.

Notes on the results above:

The eggs measured are selected from medium-range products across the market, with an extensive range of smaller and larger eggs also available. Direct equivalents were unavailable for some eggs therefore the closest possible representation was sampled.

Appendix I: Research Tables

Descriptive & environmental information							
Brand of Easter egg	Price of product (£)*	Description of packaging	Environmental & recycling information on packaging				
Mars	1.00	Card carton, card insert, foil-wrapped egg, 2 mini Mars bars.	Carton fully recyclable, foil - ask local recycling centre. Green dot logo.				
Green & Black's	5.59	Card box, foil-wrapped egg.	No recycling information, "please recycle where possible", packaging from responsible sources. Green dot logo, Organic Soil Association. Forest Stewardship Council - packaging from responsible sources.				
Lindt	6.19	Card carton, plastic inner tray, foil-wrapped egg, multiple mini sweets.	Carton and plastic are recyclable. Green dot logo, 1 rPET.				
Cadbury	1.00	Card box, card inner tray, foil-wrapped egg, 4 mini flake bars.	No recycling information, 13% less packaging on average than 2010. Green dot logo and recycling logo.				
Sainsbury's	2.00	Clear plastic box, green ribbon.	Plastic box - widely recyclable, ribbon is not recyclable.				
Thorntons supermarket egg	5.50	Card carton with plastic window, plastic inner tray, chocolates in plastic packets.	Carton - recyclable, carton window and plastic bag - not recyclable, plastic inner tray made with 50% recycled plastic. 1 PET, fitment = 50% recycled plastic. "We would love you to recycle this packaging. For more guidance visit www.recyclenow.com".				
Thorntons shop egg	3.75	Card carton, plastic inner tray, plastic window.	Carton and plastic tray - recyclable, Carton window - not recyclable. 1 PET. Fitment made from 50% recycled packaging.				
Bailey's	5.50	Card box, plastic inner tray, foil-wrapped egg, 6 mini sweets.	No recycling information.				
Guylian	5.99	Card box, plastic inner tray, foil-wrapped egg, inner card box containing plastic tray and chocolates	No environmental information. Green dot logo.				
Marks and Spencer	5.99	Card base and insert, plastic carton.	Insert and base - recyclable, plastic - check local recycling.				
Nestlé	2.50	Card box, card insert tray, foil-wrapped egg, tube of smarties.	Outer packaging and card insert - widely recyclable, foil - check local recycling centre. "Carton and tray made from materials sourced from replenished forestry."				

House of Commons	11.50	Card base, outer plastic wrapping, green ribbon.	No recycling information.
Tesco Finest	3.00	Card box with plastic window and plastic inner tray.	No recycling information.

Notes on results above

- Prices indicated are those paid for eggs though not necessarily the RRP of the eggs. Eggs were paid for personally by Jo Swinson.
- The Green Dot logo has no meaning in the UK, however it is printed on products which are exported to European member states implementing EC Directive 94/62/EC 1994, which sets recovery and recycling targets for those states.
- The recycling logo indicates that a product is recyclable.
- The Forest Stewardship Council logo indicates that the product has met FSC criteria for meeting the "social, economic, ecological, cultural and spiritual needs of present and future generations."
- 1-PET is a recyclable plastic.
- rPET is recycled plastic which is also recyclable.

Comparison over time									
	2008	2009	2010	2011	2008	2009	2010	2011	
Brand of Easter egg	weight of edible contents to total weight	% weight of edible contents to total weight	% weight of edible contents to total weight	% weight of edible contents to total weight	% of volume of egg to packaging	% of volume of egg to packaging	% of volume of egg to packaging	% of volume of egg to packaging	
Mars	73	79	74	85	16	23	26	28	
Green & Black's	64	83	83	83	17	41	41	41	
Lindt	69	67	71	71	9	9	11	11	
Cadbury	77	80	78	83	13	17	19	39	
Sainsbury's	82	84	82	82	58	53	60	60	
Marks and Spencer	83	97	79	79	35	100	34	34	
Guylian			60	60			9	9	
Nestlé	57	80	79	79	9	23	27	27	
Thorntons	77	85	85	79	24	45	49	36	
House of Commons	96	97	95	95	100	100	56	56	
Average	74.8	82.3	81	82	29.4	39.8	36	38	

Notes on this table: The Thorntons egg used in 2010 is the Supermarket product whereas this year, an average of the shop and Supermarket eggs are taken into account.

	Weight measurements of Easter eggs									
Brand of Easter egg	Weight of total product (g)	Weight of total packaging (g)	Weight of card packaging (g)	Weight of plastic packaging (g)	Weight of chocolate egg (g)	Weight of other contents (g)	% of packaging widely recycled	% of packaging not widely recycled	% of packaging not recycled	
Mars	233	54	54	0	103	76	94	5	1	
Green & Black's	229	39	39	0	190	0	93	7	0	
Lindt	347	101	53	48	131	117	49	48	3	
Cadbury	194	33	33	0	98	63	91	5	4	
Sainsbury's	134	24	0	24	110	0	94	0	6	
Thorntons supermarket egg	373	84	43	41	201	88	51	45	4	
Thorntons shop egg	240	61	36	25	181	0	55	43	2	
Bailey's	282	107	63	44	101	74	56	42	2	
Guylian	417	165	108	56	125	127	65	35	0	
Marks and Spencer	248	51	18	33	197	0	35	65	0	
Nestlé	226	48	48	0	137	42	100	0	0	
House of Commons	454	21	14	5	354	79	67	24	9	
Tesco Finest	150	50	34	16	101	0	68	32	0	
Average	271	64	42	22	156	51	71	27	2	

Dimensions of Easter eggs								
Brand of Easter egg	Height of packaging (mm)	Width of packaging (mm)	Depth of packaging (mm)	Height of chocolate egg (mm)	Width of chocolate egg (mm)	Circumference of chocolate egg (mm)		
Mars	144	127	85	123	79	266		
Green & Black's	244	130	111	137	89	292		
Lindt	250	180	95	122	73	262		
Cadbury	185	104	84	158	75	258		
Sainsbury's	118	84	75	114	83	261		
Thorntons supermarket egg	252	140	120	154	112	328		
Thorntons shop egg	181	125	117	142	95	322		
Bailey's	283	220	99	139	83	277		
Guylian	307	174	118	132	90	289		
Marks and Spencer	192	101	102	153	96	300		
Nestlé	163	135	92	129	82	269		
House of Commons	175	107	115	176	112	363		
Tesco Finest	170	93	88	119	72	238		
Average	205	132	100	138	88	287		

Volume and relative measurements of Easter eggs									
Brand of Easter egg	Volume of packaging (ml)	Volume of chocolate egg (ml)	% weight of edible contents to total weight	% of volume of egg to packaging	Any landfill waste?				
Mars	1554	435	85	28	Chocolate bar wrappers				
Green & Black's	1642	681	83	41	No				
Lindt	4301	464	71	11	Chocolate wrappers				
Cadbury	1213	470	83	39	Chocolate bar wrappers				
Sainsbury's	751	447	82	60	Ribbon				
Thorntons supermarket egg	3780	815	77	22	Carton window and plastic bag				
Thorntons shop egg	2611	875	72	34	Carton window				
Bailey's	4018	576	62	14	Chocolate wrappers				
Guylian	6328	596	60	9	No				
Marks and Spencer	2035	700	79	34	No				
Nestlé	2025	538	79	27	No				
House of Commons	2120	1196	95	56	Ribbon and cellophane wrapper				
Tesco Finest	1430	398	68	28	No				
Average	2601	630	77	31					

Appendix II: Responses from Manufacturers



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29 March 2011

Dear Ms Swinson

Please find attached Thorntons' Easter 2011 headlines – I hope they will be of interest, any queries please feel free to contact me directly.

Thorntons Packaging Headlines Easter 2011

Thorntons Packaging Development team has continued to build on the successes of last Easter to minimise the environmental impact of this year's Easter range with a reduction of a further **14 tonnes** of packaging.

During the 2011 Season, Thorntons has concentrated on three key areas.

- 1. Packaging Reduction -light weighting and substitution.
- 2. Packaging Recycling increasing the use of materials that are readily recyclable, using materials which contain an amount of recycled material coupled to a consistent clear labelling strategy
- 3. Investment in equipment and processes to deliver more environmentally friendly pack formats

Background

In the 2009 season, a major review was undertaken of Thorntons' low and mid priced Easter products, with the focus during the 2010 season being on Premium Easter products, where the company changed a number of pack formats, reduced material thicknesses and removed components. Over the 2011 season the business has continued to build on these successes by further developing its products with further optimisations and reductions.

Like-for-like comparisons

By comparing repeat lines across the 2010 and 2011 seasons, Thorntons is able to show a true like-for -like figure for the weight savings made, this amounts to a total of 7.11 Tonnes.

For 2011, Thorntons committed to a large scale investment in its manufacturing processes and as part of that installation has reviewed its entire range of Easter Packaging and where possible reduced the amount of packaging used, saving 1.71 tonnes.

For the premium egg range, Thorntons has automated the main egg carton and invested in new equipment which allowed for changes to the format of the boxed chocolate selections that are sold with the eggs, enabling them to be down weighted. This saved 5.1 tonnes.

Thorntons range of small treat eggs was extended for 2011 and the packing format and material changed from a twist wrap film to a lighter weight and more readily recyclable aluminium foil. This saved a third of a tonne in packaging.

Breakthrough packaging formats

During the 2011season. Thorntons continued to innovate and produced 593.947 Easter Bunnies in a new bagged format. Previously a model such as this would have been packed in a PET carton with two formers and a clear seal, contrasting the weight of the bag and tie versus an existing traditionally packed model. Thorntons was able to reduce overall weights by 6.9 tonnes. This format has now been extended into Thorntons Valentines Day range.

Packaging Sources

All major components used are sourced from recyclable materials and where possible contain a level of post consumer waste. Where the decision has been made to remain in virgin grades this has been done to achieve a balanced position between the benefits of increasing recycled levels against the need to up weight items to maintain strength.

Recycling

Thorntons is dedicated to using recyclable materials wherever possible and providing a clear and consistent recycling message across all its packaging formats to aid consumer choice. Thorntons also references the recycle now website www.recyclenow.com to further help consumers with their recycling.

Future Plans

Work on the Easter 2012 season has already started. The entire Easter range has now been optimised against Thorntons supply base and equipment and the company predicts further modest improvements for the 2012 season. Thorntons will continue to concentrate on breakthrough packaging formats to keep the impetus on delivering a significant year-on-year saving.

We look forward to reading your report, if I can be of any further assistance please feel free to contact me.

Yours sincerely

Robin Paul Parry-Jones

Head of Packaging

Thorntons plc

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24 March 2011



Jo Swinson MP House of Commons London SW1A 0AA Tesco Stores Limited
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e-mail: ben.coates@uk.tesco.com

Dear Ms Suisson

Thank you for your letter of 10 March to Philip Clarke about excess packaging in Easter eggs. Philip has asked me to reply on his behalf.

At Tesco we are committed to reducing packaging where we can do so without compromising its role in protecting, preserving and giving information about the product. We have reduced packaging on our own label products by 15% since 2007, saving a total of 100,000 tonnes of packaging. This forms an important part of our efforts to reduce the emissions embedded in the products we sell by 30% by 2020.

Unfortunately it is difficult to make like for like comparisons specifically for Easter eggs. This year in own label we have reduced our range and will only be selling Finest eggs, most of which are different products to those we sold last year.

However, I can tell you that this year's Easter egg packaging designs follow the five principles that underpin all our packaging: it should be fit for purpose; use the lightest weight materials; use materials from the most sustainable sources; maximise opportunities for recycling and recovery; and be designed to have the lowest carbon impact.

For example, our Finest Milk Chocolate Half Egg is wrapped in a clear film rather than rigid plastic. To allow us to use this more lightweight packaging design we have increased the thickness of the egg to make it more stable and ensure it does not go to waste through crushing.

I would like to take this opportunity to wish you the best with your research and I look forward to hearing how we perform this year.

Please let me know if I can be of any further help.

Ben Coates

Government Affairs Director

Nestlé UK Ltd

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YOUR REF:

OUR REF:

DATE:

31 March 2011

Dear Ms Swinson

Thank you for your letter of 10th March to our global Chairman Peter Brabeck-Letmathe regarding Easter egg packaging.

We very much welcome the feedback that we have received from you in previous years as part of your Easter Egg Packaging Annual Progress Report and the positive comments that you made last year on our Easter egg packaging reductions and the work we have done to encourage consumer recycling. I'm pleased to provide you with a summary of our work over the last 3 – 4 years and also an update on further reductions in Easter egg packaging achieved for 2011 which I hope is helpful.

Since the early 1990's Nestlé has been reducing the amount of packaging used through our global source reduction programme and we are continually looking at ways to reduce the amount of packaging used and promote recycling wherever possible. In the UK & Ireland specifically, almost 90% of Nestlé's packaging is already recyclable and we have reduced packaging by 20,000 tonnes since the start of the global packaging reduction programme.

With regard to Easter eggs we have been working for a number of years to reduce the weight of packaging and increase the quantity of recyclable materials used. A summary of the work completed over the last few years and for 2011 is below.

2006 - 2010

- Since 2006 the weight of packaging for small and medium-sized Easter eggs has reduced by 30 – 50%.
- Plastic inserts have now been removed from 90% of all Easter eggs.
- In 2009, Nestlé Confectionery UK became the first major confectionery company in the country to replace non-recylable plastic with recyclable cardboard packaging in 20 million Easter eggs, 80% of the 25 million we produced that year. We also reduced our packaging for small and mediumsized eggs by 30% in 2009, helping to save over 700 tonnes of materials. The 30% reduction exceeded the WRAP industry agreement to reduce medium egg carton weight by 25%.



 In 2010, we also introduced cardboard trays to many of our large Easter eggs, replacing plastic inserts and reduced the packaging used in large eggs by 50%.

2011

- Although the 2011 reductions are smaller than in previous years, Nestlé
 Confectionery UK has reduced the amount of packaging materials used for
 medium Easter eggs by a further 100 tonnes (-12.6%) versus 2010 (this is in
 addition to the savings in previous years).
- This has been achieved by reducing pack sizes and the use of different formats such as foil wrapped hollow figures. For example our key new launch is the Smarties Chicken and Egg which has foil packaging that is recyclable and weighs 1.4g vs. a product weight of 117.5g.

Looking forward our aim is to remove plastic inserts from all Easter eggs by 2012 and we very much look forward to keeping you updated on our progress.

Thank you again for your letter. If you have any questions or require further information please do let us know.

With kind regards

Sam Fulton

Head of Public Affairs

Nestlé UK



Sint-Niklaas, 18-Apr-11

Dear Mrs. Swinson,

With this letter we would like to inform you of the work Guylian has done to reduce the amount of packaging materials used for Easter egg packaging. We have looked at our present packaging and for Easter 2011, we have gone back to the basics. We have tried to develop an Easter egg packaging which protects the chocolate egg and the box of chocolates, has a minimal impact on the environment and still lives up to the style and integrity of our brand.

Some key facts:

We have developed a new, triangular packaging containing a chocolate egg of 120g and a box of 125g Guylian Sea Shells. This resulted in:

packaging volume: reduction of -70%

2010: 6301ml 2011: 1899ml

• % volume egg to packaging: increasement of +21%

2010: 9.36% 2011: 31%

• Cardboard packaging weight: reduction of -42%

2010: 93.4 gram 2011: 53 gram

• Plastic clam: reduction of -93%

2010: 50.5 gram 2011: 3.5 gram

Logistics: increasement of 50%

2010: 4 units per outer

2011: 6 units per outer

We have significally downsized the cardboard packaging, optimised the corrugated outer packaging and reduced the plastic (RPET) part to a minimum.

We have also added, clearly visible to the consumer, environmental information on the packaging with waste symbols for the different packaging materials, website information and consumer guidance.

For Easter 2011 we will have the new packaging but also a number of Easter 2010 packaging in the stores. These are the remains of the previous packaging material productions.

For 2012 we intend to also change the rest of our Easter egg range and so reduce the impact of excess packaging material for Easter eggs worldwide.

I've attached a picture of the 2011 and 2010 packaging next to each other. This way you can compare the packaging size and the drastic reduction in packaging waste.

If you have any questions please let us know.

Kind regards,

Hilde D'Hooge Jan Jooris

Quality Assurance/R&D Mgr Mgr Packaging Development







STATEMENT ON Lindt Easter Range

EASTER 2011

Lindt & Sprüngli strives to reduce the volume of packaging wherever possible within its Easter range and is committed to using recycled, recyclable and biodegradable materials whenever stringent quality standards allow.

The Lindt Gold Bunny range of hollow chocolate figures, comprising chocolate, gold wrapping foil, a ribbon and bell, is one of Lindts most efficiently packaged Easter chocolate product ranges. Lindt Gold Bunny hollow figures are the biggest selling product range within the Lindt Easter portfolio and represented 50% of Lindt's total Easter sales in the UK in 2010, with over 4,081,000 units sold. For each 200g Gold Bunny, just 4g of packaging waste is produced, the equivalent of 2% of the product's total weight. In contrast, Lindts Easter Shell Egg sales accounts for just 15% of total Lindt Easter sales. Lindt sold 735,000 units of Easter Shell eggs in the UK in 2010, with an average packaging waste of 36.7%.

In line with efforts to reduce packaging volume and waste levels, the Lindt Gold Bunny hollow range remains the primary focus of the Lindt Easter portfolio.

ENDS

For more information on the Lindt Easter product range contact Sophie Gregory on 020 7632 2400 / lindt@publicasity.co.uk

For further details on Lindt: www.lindt.com

Sales Value and Volume Source: AC Nielsen Scantrak 15 Wks to 03/04/10 versus 16 Wks to 11/04/09
Packaging analysis based on sample of Lindt 2011 Easter Eggs weighting between 300g and 350g (Displayed Product Weight)

Packaging waste based on comparison of unit packaging and chocolate packaging waste weight versus chocolate weight within a product unit

Whenever Easter range, Easter chocolate product ranges, Easter portfolio, Easter chocolate market, Easter sales is used it refers to Lindt Easter specific products sold between 15 Wks to 03/04/10 and/or/versus 16 Wks to 11/04/09 Lindt GOLD BUNNY hollow range refers to the following products: Gold Bunny Milk 50g, 100g, 200g, 400g, 500g, 1kg – Gold Bunny Dark 100g, 200g – Gold Bunny White 100g, 200g – Gold Bunny 10g

From: emma.webbon@effem.com [mailto:emma.webbon@effem.com]

Sent: 31 March 2011 16:10

To: SWINSON, Jo

Cc: karen.barker@effem.com; clare.moulder@effem.com

Subject: Easter

Attn: Jo Swinson

Thank you very much for your letter dated 14th March 2011. As you will be aware from our correspondence over previous Easters, Mars has taken major steps to reduce Easter Egg packaging, to increase recyclability and to include messaging to encourage consumers to recycle, and we are proud of the progress that we have made so far. This is part of our wider sustainability strategy. I am attaching some information which we submitted to you in 2010 which recaps some of the progress to date. For 2011 the main difference that you will see on our Easter range is that we will be including messaging on our Galaxy eggs around our cocoa sustainability commitment and work with the Rainforest Alliance.

With regards to other seasonal ranges, changing our Christmas tubes to cardboard cartons at the end of last year resulted in a reduction of 100 tonnes; and for Christmas 2011 we will have reduced the packaging used in our selection boxes by 15%.

Our work in this area continues both on our Easter and Christmas product ranges and packaging more widely. In the early years, we concentrated on making an immediate difference - tackling the most obvious areas of wasteful packaging and work ongoing tackles some of the more intractable problems. I look forward to updating you with further progress across our seasonal ranges as we announce it.

Best wishes,

Emma Webbon Public Affairs Manager

Emma Webbon Public Affairs Manager, Corporate Affairs MARS (UK)

T: +44 (0) 7807 150525

E: emma.webbon@effem.com (please note changes to my email address)

Marks & Spencer Waterside House 35 North Wharf Road London W2 1NW

Tel: 020 7935 4422 www.marksandspencer.com

30th March 2011 922.PW/AJH

Jo Swinson MP

(jo.swinson.mp@parliament.uk)

Dear Ms Swinson,

EXCESS PACKAGING IN EASTER EGGS

I would like to thank you for the opportunity to update you on the work we are doing to reduce and optimise our packaging, with specific reference to our range of Easter confectionery.

Packaging reduction has been a key area of focus for us and across our foods, drinks, flowers and household products we have already achieved a 20% reduction in the weight of packaging in these areas. This progress has been achieved since we set out our commitment to reduce our non-glass packaging by 25% as part of Plan A - launched in January 2007.

We have reduced our Easter Chocolate packaging by 45% since the start of Plan A in 2007, and the average weight of the packaging compared with the total product weight is less than 7% representing approximately 94 tonnes. We believe we have now achieved the optimum balance of packaging to product, demonstrating packaging reduction, reducing food waste, while meeting the demands of our customers who want to give their loved ones beautiful looking eggs.

We have completed the optimisation work on our Easter 2011 packaging while increasing the recyclability of the materials used (over 90% of the Easter packaging is recyclable), which is very important to ensure that these materials can be re-used in food or other useful products in the future. To help our customers understand how best to recycle the packaging we have continued to include recycling information, based on the WRAP On Pack Recycling Logo system, for which we are an active member of the OPRL scheme.

It is important to ensure that food packaging is collected and recycled in the UK, which is why we are investing in Strategic Local Authority Recycling Projects, and have announced Somerset as our first strategic partner. We are pleased to be able to inform you that in the first 12 months of working with Somerset, through our investment in their recycling services, we have enabled the collection of over 5,000 tonnes of packaging - materials that would have previously gone to landfill.

Please find a number of key achievements that hopefully will help to answer your questions.

We have reduced our Easter chocolate Packaging by 45% since the start of Plan A.

Over 93% of the total weight of the Easter range this year is product, with less than 7% packaging

(on average by weight).

• The packaging for the Easter range we will sell this year is over 90% recyclable, which is in-line

with our business targets.

• Since pioneering the use of recycled plastic in 2004 for food packaging, we now use recycled content in over 80% of our PET and HDPE packaging across the business, with over 80% of this

year's Easter range also containing a recycled PET content.

Since 2007 we have reduced all our non-glass packaging by 20%, and have increased the recyclability of our packaging in the process (over 91% of all our packaging is recyclable) showing

our commitment to reduce packaging to an optimal level.

Overall, we have aimed to optimise our packaging use, showing a balanced approach to an acceptable use of packaging for which the primary function remains to protect the product. This allows us to provide the products to our consumers in the quality that they expect while minimising food

waste in the supply chain.

I hope that this response illustrates not only our firm commitment to packaging reduction and the reduction of food waste, but to the overall wider environmental issues we face. Please do not hesitate to contact me to discuss further regarding this area of our packaging, or alternatively, if you have time

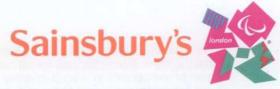
I would be happy to meet up to take you through our progress of all our Plan A packaging commitments.

Best regards.

Yours sincerely

PAUL WILLGOSS
HEAD OF TECHNOLOGY – FOOD DIVISION

Direct Line: 020 87 188276/188247 paul.willgoss@marks-and-spencer.com



official partner of the Paralympic Games

Justin King

33 Holborn London ECIN 2HT

Group Chief Executive

Sainsbury's Supermarkets Ltd

Switchboard 020 7695 6000 www.sainsburys.co.uk

Jo Swinson MP House of Commons London SW1A OAA

Tuesday, 29th March 2011

Dear Ms Swinson,

Re. Excess packaging in Easter eggs

Thank you for your letter recent letter.

In relation to packaging reduction, we have the UK's leading packaging target of 33% by 2015 compared to 2009. We have made progress in the last year by removing 8,000 tonnes of packaging from our own brand products through new packaging design. We were an original signatory of the first Courtauld commitment, were part of the development and launch of Courtauld II and are now working with WRAP towards Courtauld III.

Our aim is to reduce packaging to that which is required, using recycled and or sustainable materials and ensuring that the packaging used is recyclable where possible. Examples include the introduction of a reusable jug and bags for milk, which has proved a success with our customers. We are the first retailer to move 100% of our milk bottles to a 10% recycled content, ensuring that all of our customers have a reduced packaging impact.

We were founding members of the BRC/WRAP - OPRL (On Pack Recycling Label) scheme, which is now in use on over 60,000 products from over 100 suppliers throughout the UK. The scheme delivers a consistent approach to recycling information for our customers, who are then faced with an inconsistent service by local authorities. We believe that a consistent approach to the provision of recycling services through local authorities will drive the quality, consistency and ability to improve recycling within the UK.

In terms of recent progress on Easter eggs specifically we have collaborated with our suppliers and have made considerable reductions in our own brand Easter egg packaging. Through a number of initiatives, for example introducing Forest Stewardship Council carbon-board and recycled plastic, or removing certain heavier materials entirely, we have reduced packaging by 57% since 2008.

Working with WRAP we are moving towards completion of the latest project looking at the collection, sorting, recycling and re-use of mixed plastic waste, in this case focusing on conversion to temporary construction cladding and refuse sacks. Additionally we have just completed in store commercial trials with WRAP, looking at the reuse of 100% recycled glass, as we attempt to tackle the issues associated with the mixed glass local collection systems.

We have introduced light weight and plastic bottles for our basics beer, wine and spirits; moved our chopped tomatoes out of cans and into tetra-pak and have moved own brand cereals into bags and out of boxes. We are currently thinking about what our future targets need to be and the packaging team here constantly evaluates new packaging materials that help the packaging to be lighter in weight, or with more recycled content, or to have lower embedded carbon associated with it. We do this in the context and being mindful of driving to reduce food waste within our business and helping our customers reduce their waste.

I hope this reassures you of our ongoing commitment to reduce packaging.

Yours sincerely,

Justin King



Cadbury UK Dadbury House, Sandemon Road, Uxbridge, Middlesex, UBS 1DH.

Jo Swinson MP 4 Springfield House Emerson Road Bishopbriggs Glasgow G64 1QE

4th April 2011

Packaging of Cadbury Easter Eggs

Dear Jo,

Thank you for your letter sent on the 10th March 2011. Our delay in responding is due to your letter having been sent the wrong addressee. Please could you update your records such that future correspondence is directed to Nick Bunker, President Kraft Foods UK & Ireland.

We are pleased to have the opportunity to provide you with details regarding the packaging of our Easter Eggs.

Our product offer this year demonstrates our ongoing commitment to more effective packaging of our products.

Our range of medium sized boxed shell eggs is one of our largest Easter sales volumes and therefore presents a significant opportunity to reduce the amount of packaging used. The packaging of this range has reduced year on year since 2007. Packaging is now around half of that of five years ago based on average packaging weights for this product range, including both consumer and secondary/ transit packaging. The packaging of these products has been further reduced this year as communicated to the consumer on pack.

This has been achieved through staged reduction in the consumer pack size, which has in turn enabled an increased number of units per sales case, hence a reduction in secondary/ transit packaging per unit with an associated reduction in food miles associated with their distribution. This year also sees the removal of the plastic thermoform from the packaging design, reducing material use and making the packaging easier for consumers to recycle.















Our range of large boxed shell eggs also demonstrates further reduction this year through improved design and removal of the plastic thermoform, which is similarly communicated to the consumer via an on pack message.

Our Easter offer continues to include our range of unboxed, foil wrapped products including Easter Chick and Treasure Eggs. Although these products have a greater reliance on secondary and transit packaging to ensure high quality standards for our consumers, the overall packaging of these products remains significantly lower than the comparable boxed product.

Reduction in the packaging of our products remains a key sustainability target for our business as we embed the prior environmental programme of the Cadbury business within the corporate sustainability goals of Kraft Foods, which has specific targets for packaging reduction.

Our adoption of the UK government's responsibility deal on packaging (the second phase of the Courtauld Commitment) supports our internal programme of reducing the environmental impact of packaging throughout our supply chain.

Our ongoing developments in the packaging of our products will ensure that the changes we make do not compromise food safety or quality and continue to provide consumers with gift worthy seasonal products.

Please contact me if you would like any further information or discussion.

Yours sincerely,

Matt Bardell

Corporate Affairs Manager, Sustainability

Sent via email to jo.swinson.mp@parliament.uk













Dear Ms Swinson

Excess Packaging in Easter Eggs

I would like to thank you for your letter dated 14th March 2011 and for the opportunity to share the work we have been carrying out in relation to our Easter Egg Packaging.

We launch in excess of 450 products every year so while our overall commitment is to reduce packaging weight across the business, our emphasis is focussed primarily on the high volume seasonal lines such as Easter Eggs. Due to the number of packs sold every year a small reduction in packaging weight makes a substantial difference. As with other manufacturers our challenge is to reduce the amount of packaging used whilst ensuring the overall pack is fit for purpose and our products reach the Consumer in the best possible condition. It is also important to be aware of and minimise the risk of waste throughout the supply chain as a result of poorly constructed or packaged materials.

As indicated within your letter, one of the best measures is packaging weight as a percentage of total product. A good example of where we have made year on year reductions is that of our Kids Egg. The pack is 74g in weight and we sell in excess of 2,000,000 packs every Easter. We have reduced the percentage of packaging in this product from 37% in 2009 to 33% in 2011. For 2012 we are working on a concept that will remove the plastic insert altogether, reducing the overall weight even more.

Kinnerton Kids Egg



The choice of packaging materials used across all of our products is based on a number of factors including product type, proximity to naked chocolate and the fragility of the contents. We select the most appropriate materials which include recycled and virgin board and recycled plastic. Where appropriate we have replaced plastic inserts with cardboard but all of our materials can be recycled and this is clearly indicated on the packaging.

Factory waste initiative

This is based around reducing the amount of waste packaging that is sent to landfill. We have invested in additional balers to enable us to compact and bale surplus packaging.

We work closely with our waste management contractor and have diverted 80% of our waste from landfill for reuse or recycling over the past 12 months.

I hope this demonstrates our commitment to overall packaging and waste reduction within the confectionery market. If you would like any further information, please do not hesitate to contact me.

Yours sincerely

Neil Richards

Packaging Manager

Kinnerton Confectionery