



2. A flurry of voluntary initiatives

In this chapter, we take a closer look at voluntary commitments from some of the top plastic polluters, and scrutinise the initiatives rolled out by industry-backed alliances. In the first part of the chapter, we assess individual company commitments against a number of criteria: support for progressive legislation, ambitious targets that go beyond legislation and whether commitments are applied consistently across all markets.

In the second part, we take a look at some of the most prominent group commitments, backed by the industry and, in some cases, supported by governments and NGOs. We assess their level of ambition and shortcomings, and analyse where they stand on addressing the plastic crisis.

Faced with increasing public awareness of – and consumer backlash against – plastic pollution, consumer-goods companies, retailers and plastic manufacturers have been quick to make a raft of voluntary and non-binding pledges to end plastic waste. Some targets are put forward by individual companies; for example, Coca-Cola’s numerous commitments to increase the share of recycled content. Others are made through industry-endorsed alliances set up to tackle the issue; for example, members of the Alliance to End Plastic Waste have pledged to invest \$1.5 billion over the next five years to prevent plastic leaking into rivers, seas and oceans.¹

While voluntary initiatives in themselves are not inherently bad – and, indeed, play an important role in some contexts – it is vital to challenge weak and misguided initiatives that hinder rather than help. It is especially important to denounce initiatives that are false solutions, serving to distract consumers and governments while simultaneously boosting a company’s reputation.



As this chapter will highlight, the majority of voluntary pledges and targets put forward by individual companies and industry alliances continue to place the onus on the consumer to recycle more, or to switch to ‘greener’ products. Companies make commitments to 100% recyclable plastic packaging, which look and sound impressive to consumers while failing to address the fact that ‘recyclable’ does not necessarily mean the product is, in practice, recycled – much of the plastic currently in the ocean is technically ‘recyclable’. Since collection of packaging is a basic precursor to both recycling and reuse, companies cannot guarantee their packaging is recycled without any commitment to collecting it. Pushing messages of recyclability without mentioning mandatory collection and producer responsibility conveniently allows companies to continue with their business-as-usual approach to single-use plastics, rather than taking responsibility for the products they put on the market. At the same time, their plastic continues to end up in marine ecosystems and to pollute the en-

vironment.

Moreover, many of the voluntary initiatives put forward by industry fail to reduce plastic pollution at its source, instead focusing on end-of-pipe solutions, such as litter-picking or ocean clean-ups. Beyond their role in raising awareness – and, in some cases, documenting which brands pollute the most – clean-up efforts are not an effective solution so long as a steady stream of new plastics keeps being produced and discarded; they are akin to mopping the floor, instead of turning off the tap, when the bath is overflowing.

Another problem with voluntary commitments is they are rarely applied across all the markets in which a company operates. For example, a recent Tearfund report shows that Unilever and Coca-Cola use a larger amount of plastic, per euro of sales, in low- and middle-income countries than their global average. Coca-Cola was especially highlighted as the worst polluter; although it is smaller than Unilever, Nestlé and PepsiCo (in terms of revenue), it uses more plastic than the other companies investigated.²

Finally, a lack of accountability and the non-binding nature of voluntary commitments mean pledges often end up as no more than a trail of broken promises. For example, as far back as 1990, Coca-Cola claimed it would sell soft drinks in bottles made from 25% rPET,³ but their bottles still include only 10% rPET.⁴

2.1. Individual company commitments

2.1.1. Criteria for assessing companies

This section takes a closer look at the top plastic-polluting companies, according to the 2018 and 2019 Brand Audit reports published by Break Free From Plastic.^{5,6} The majority of companies appeared in the list of top ten plastic polluters in both the 2018 and 2019 audits; however, for the purposes of this report, we have chosen to look at Danone – a major producer of plastic packaging – which appeared fourth in the 2018 audit, instead of tobacco giant Philip Morris International, which came in ninth in the 2019 audit. Here, we take closer look at the voluntary commitments from each company, and provide an overview of what they claim to be doing on plastic pollution (see Table 2.1).

To assess the voluntary commitments made by each company, we focus on three main areas:

- 1. Support for progressive legislation;
- 2. Scale of ambition; and
- 3. Transparency and accountability.

The following three sections outline the criteria for each area in more detail.

2.1.2. Support for progressive legislation

High levels of separate collection, through mechanisms like DRS, are central to increasing levels of reuse and recycling for four reasons. First, by supporting the right mechanisms for collection, clean waste streams of recyclable materials are created, stimulating use of high-quality recycled content in companies’ products. Second, refill and reuse can be built into such collection systems (see Box 4.4). Third, mandatory collection means companies will have to rethink the products they put on the market; for example, by making them out of easy-to-recycle materials or shifting to refillables. Finally, although decreasing the amount of plastic produced is critical for addressing climate change and plastic pollution, if plastic materials still end up in the environment at the end of their life, we would continue to face problems for the environment, human health and wildlife. This is why we focus on companies’ responsibility to collect the plastic they put on the market to prevent it entering the environment.

Separate-collection legislation, in combination with recycled-content targets, is an important step in the right direction. Companies calling for, and supporting the implementation of, such legislation would show their commitment to creating a circular economy and becom-

ing part of a real solution for tackling plastic pollution. Therefore, to assess whether a company is committed to supporting progressive legislation, we look at whether the company calls for such legislation for different types of plastic packaging, and whether their support for such legislation is applied globally or only in specific geographies. In addition to separate collection and recycling, we also look at companies' commitment to reuse models, especially the scale of their commitment and whether they go beyond a few nice-sounding pilot projects.

2.1.3. Scale of ambition

We have focused on three criteria through which a company could show their ambition on tackling plastic pollution.

First, we looked at companies' targets, commitments and progress on reuse. The circular economy requires fundamentally rethinking business models - acknowledging that plastic pollution cannot be solved through more recycling alone, but rather by stopping waste being created in the first place, and making sure products can stay in use. Refillable beverage containers, for example, can be reused many times before needing to be recycled, keeping valuable resources in the production cycle for as long as possible. Refillable PET bottles can be reused up to 15 times, and refillable glass bottles as many as 25 times,⁷ leading to greenhouse gas (GHG) savings and avoiding the environmental impacts associated with their production and end-of-life management.⁸ Tellingly, despite the fundamental importance of reuse to the circular economy, the Ellen MacArthur Foundation's (EMF) New Plastics Economy Global Commitment Progress Report 2019 highlights that, while a third of signatories are testing and piloting reuse schemes, less than 3% of signatories' packaging is actually reusable today.⁹

Second, we looked at whether companies are setting ambitious minimum recycled-content and collection targets for their plastic packaging. This drives demand for recycled plastic, and - although not the only solution - helps ensure material is maintained in a closed loop and not downcycled. Recycled-content commitments should also include intentions to phase out toxic chemicals in the design phase of their products and ensure mandatory traceability of harmful chemicals along the value chain. These targets, set by companies, have a positive knock-on effect for improving and increasing the collection rate of single-use plastics, and provide an important tool for both preventing plastic pollution and reducing virgin-plastic demand. Putting ambitious targets in place also complements calls to follow the EU's mandate of over 90% separate collection of beverage bottles, as companies would need the collection mechanisms in place to obtain large volumes of high-quality recyclable material.¹⁰

Third, we looked at whether companies go beyond existing EU legislation (the most ambitious legislation currently in place) and set their own minimum recycled-content targets of at least 50% for bottles and at least 30% for other plastic packaging by 2030.¹¹ Although not studied in this report, several companies - including L'Occitane and Diageo - have already committed to targets for uptake of recycled plastics that surpass the target set by the EU SUP Directive.¹² Ideally, a company's own ambitious voluntary recycled-content targets would occur in tandem with their calls for legislation, which would set minimum recycled content and collection obligations for plastic packaging in all geographies where a company's products are sold.

Finally, we looked for ambition and leadership on plastic pollution by assessing whether a company aims to reduce reliance on 'problematic' disposable plastic items,^a such as straws, cutlery, plates and cotton buds (to name a few) and problematic materials, such as PVC. This reduction in single-use plastics should avoid, where possible, substitution with other single-use materials - such as paper, wood or bamboo - as this perpetuates a throwaway culture, and is likely to have unintended environmental consequences. Instead, it should lead to redesign of a product, or replacement with reusable alternatives.¹³

Coca-Cola plastic pollution |
Credit: David Mirzoeff |

2.1.4. Transparency and accountability

To assess transparency and accountability for commitments and progress on tackling plastic pollution, we looked at four indicators.























First, we looked at whether a company reports its plastic footprint - the total volume of plastic packaging used. As part of the EMF's drive for transparency, several major companies that have previously refused to publicly disclose such figures have now revealed how much plastic packaging they create. Nevertheless, 80% of companies signed up to the New Plastics Economy Global Commitment still refuse to disclose the total tonnage of their plastic production or usage, as of the latest Progress Report.¹⁴

Second, we looked at whether a company talks about its progress against achieving an absolute reduction in total number of single-use plastic-packaging units, which does not include lightweighting existing products. Although lightweighting - for example where plastic



^a Problematic items are those that are either commonly littered and environmentally harmful; avoidable or unnecessary; unrecyclable; or where a viable reusable alternative exists.

Overview of company commitments

Company	HQ	Revenue	Support for Progressive Legislation		Scale of Ambition	Scale of Ambition	Transparency and Accountability			
	Country	Revenue (billion USD)	Do they call for over 90% mandatory separate collection of plastic packaging globally?	Have they made significant progress on systems for refill and reuse?	Do they have a minimum recycled-content target of at least 50% for beverage bottles and 30% for plastic packaging by 2030?	Are single-use plastic items reduced or replaced with reusable alternatives (rather than replaced with single-use products in another material)?	Do they report total volume of plastic packaging used? (metric tonnes)	Do they openly report on an absolute reduction in total number of single-use plastic-packaging units?	Do they openly report progress on the total percentage of recycled content in their plastic packaging?*	Are commitments applied consistently across all markets in which the company operates?
	 USA	37.27	ONLY IN WESTERN EUROPE. (AND QUALIFIED SUPPORT IN THE USA)	REUSE DELIVERY MODELS ALREADY EXIST FOR A SIGNIFICANT PROPORTION OF PRODUCTS OR PACKAGING; HOWEVER, THE COMPANY HAS BEEN DISMANTLING SUCH MODELS AROUND THE WORLD.	TARGET OF 50% RECYCLED MATERIAL IN ALL PRIMARY PACKAGING BY 2030.	PLANS TO ELIMINATE PLASTIC STRAWS BY 2025; BEING REPLACED WITH PAPER STRAWS BY COCA-COLA AUSTRALIA.	2.9 million		CURRENTLY USING 10% RECYCLED CONTENT IN ALL PLASTIC PACKAGING; HISTORIC LANGUAGE CHANGE AND GOALPOST SHIFTING ON TARGETS FOR RECYCLED CONTENT.	COMMITMENT TO SUPPORT DRS ONLY IN WESTERN EUROPE; ACTIVELY UNDERMINING DRS IN OTHER REGIONS.
	 USA	15.5		REUSE DELIVERY MODELS IN PLACE FOR A VERY SMALL PROPORTION OF PRODUCTS OR PACKAGING; TRIALLING LOOP.	TARGET OF 25% BY 2025 FOR ALL PLASTIC PACKAGING.	PLANS TO ELIMINATE SINGLE-USE PLASTIC BAGS BY 2025; NO DETAILS ON WHETHER BEING REPLACED WITH ANOTHER SINGLE-USE MATERIAL.	287,008		CURRENTLY 7% RECYCLED CONTENT IN ALL PLASTIC PACKAGING; BUT THIS FIGURE DIFFERS FROM THE 45% GIVEN IN THEIR WEBSITE COMMUNICATIONS.	
	 FRANCE	29.1	PLEDGE TO HELP TO MEET OR GO BEYOND MANDATORY COLLECTION TARGETS, AS SET BY REGULATORS WORLDWIDE. (BUT DOES NOT CALL FOR REGULATIONS GLOBALLY).	REPORTS THAT HALF OF ITS WATER VOLUMES AND ONE-THIRD OF THE WHOLE BUSINESS IS IN REUSABLE PACKAGING BUT THE EXTENT OF ITS ACTUAL REUSE IS NOT CLEAR. REPORTS TO EMF 8.3% OF REUSABLE PACKAGING.	TARGET AVERAGE OF 25% BY 2025 FOR ALL PLASTIC PACKAGING. TARGET AVERAGE OF 50% BY 2025 FOR BEVERAGE BOTTLES.	PLANS TO ELIMINATE SINGLE-USE PLASTIC STRAWS AND CUTLERY BY 2025; NO DETAILS ON WHETHER BEING REPLACED WITH ANOTHER SINGLE-USE MATERIAL.	820,000	COMMITTED TO HALVING THE AMOUNT OF VIRGIN PLASTIC IN ITS WATER BRANDS.	CURRENTLY 6.4% RECYCLED CONTENT IN ALL PLASTIC PACKAGING, INCREASED FROM 5.3% IN 2017. REPORTS FIGURES FOR PAPER, GLASS, METAL AND PLASTIC TOGETHER IN THEIR OWN COMMUNICATIONS.	COMMITMENT TO SUPPORT 90% COLLECTION ONLY IN EUROPE.
	 USA	37		REUSE DELIVERY MODELS IN PLACE FOR A SMALL PROPORTION OF PRODUCTS OR PACKAGING; TRIALLING LOOP.	TARGET AVERAGE OF 30% BY 2025 FOR ALL PLASTIC PACKAGING.	PLANS TO ELIMINATE PLASTIC STRAWS BY 2020; APPEAR TO BE REPLACING SINGLE-USE PLASTIC WITH SINGLE-USE PAPER AND CARDBOARD.	184,000	COMMITTED TO REDUCING VIRGIN PLASTIC PACKAGING BY 25% BY 2025, BUT HEAVILY DEPENDENT ON CHEMICAL-RECYCLING TECHNOLOGY.	CURRENTLY 0% RECYCLED CONTENT IN PLASTIC PACKAGING; PROGRESS RELIES HEAVILY ON CHEMICAL RECYCLING.	
	 USA	25.9		VAGUE COMMITMENT "TO TAKE ACTION TO MOVE FROM SINGLE-USE TOWARDS REUSE MODELS WHERE RELEVANT".	5% BY WEIGHT (END DATE NOT GIVEN), PLUS SOME CONCERNING TRENDS OF USING CHEMICALLY RECYCLED CONTENT IN PACKAGING.	VAGUE COMMITMENT TO "TAKE ACTION TO ELIMINATE PROBLEMATIC OR UNNECESSARY PLASTIC PACKAGING BY 2025".	NOT DISCLOSED	TARGET TO ELIMINATE 65,000 TONES OF PACKAGING, BUT UNCLEAR HOW MUCH RELATES TO PLASTIC.		
	 SWITZERLAND	93.4	SUPPORTS MANDATORY EPR AND LOCAL DEPOSIT SYSTEMS, BUT COLLECTION ONLY MENTIONED EXPLICITLY IN RELATION TO MEMBERSHIP OF THE EUROPEAN FEDERATION OF BOTTLED WATERS.	REUSE DELIVERY MODELS IN PLACE FOR 20% OF WATER PRODUCTS AND A SMALL PROPORTION OF OTHER PRODUCTS OR PACKAGING (1%); TRIALLING LOOP AND HAS INVESTED 8 MILLION CHF IN REUSE TRIALS AND COMMITTED TO FURTHER ACCELERATE REFILL OPTIONS.	TARGET OF 15% BY 2025 FOR ALL PLASTIC PACKAGING; COMMITTED TO REDUCE VIRGIN PLASTIC BY ONE-THIRD BY 2025, AND TO INVEST 2 BILLION CHF TO BUY FOOD-GRADE rPET.	MOSTLY REPLACING SINGLE-USE PLASTIC PACKAGING WITH OTHER SINGLE-USE ALTERNATIVES. HOWEVER, IS PART OF LOOP AND HAS INVESTED 8 MILLION CHF IN REUSE TRIALS AND COMMITTED TO FURTHER ACCELERATE REFILL OPTIONS.	1.7 million	COMMITTED TO REDUCING VIRGIN PLASTIC BY ONE-THIRD BY 2025.	CURRENTLY 2% RECYCLED CONTENT IN ALL PLASTIC PACKAGING AND 5% RECYCLED CONTENT IN PET WATER BOTTLES. GREENPEACE IDENTIFIED FAILURE TO DISCLOSE COMPLETE INFORMATION.	DISCUSSION OF 90% COLLECTION ONLY AS PART OF EUROPEAN FEDERATION OF BOTTLED WATERS CONTINUES SINGLE-USE, NON-RECYCLABLE SACHETS IN EMERGING MARKETS.
	 USA	65		REUSE DELIVERY MODELS IN PLACE FOR SOME LINES OF PRODUCTS AND PACKAGING. ACQUISITION OF SODASTREAM. REPORTS 0% REUSABLE PACKAGING.	TARGET OF 25% BY 2025 FOR ALL PLASTIC PACKAGING.	PLANS TO ELIMINATE PLASTIC STRAWS BY 2025; NO DETAILS ON WHETHER BEING REPLACED WITH ANOTHER SINGLE-USE.	2.3 million	COMMITTED TO 35% ABSOLUTE REDUCTION IN VIRGIN PLASTIC ACROSS ITS PORTFOLIO BY 2025, BUT ONLY A 1% REDUCTION WAS MADE IN 2019.	CURRENTLY 4% RECYCLED CONTENT IN ALL PLASTIC PACKAGING, BUT HIGHLIGHT SELECTIVELY HIGHER RATES IN SPECIFIC GEOGRAPHIES IN THEIR OWN COMMUNICATIONS.	100% rPET BEING USED IN LIFE WATER BOTTLE IN THE USA BUT NOT ELSEWHERE.
	 ITALY  NETHERLANDS	2.7					NOT DISCLOSED			
	 USA	66.9		ONLY MENTION PARTICIPATION IN TERRACYCLE'S LOOP PROJECT IN NEW YORK AND PARIS.	TARGET OF 8% BY 2025.	VAGUE COMMITMENT THAT ALTERNATIVE MATERIALS WILL ONLY BE USED 'WHEN IT MAKES SENSE'.	714,000 <small>(DISCLOSED TO AS YOU SOW; NOT ON ITS WEBSITE)</small>	COMMITTED TO REDUCE ITS VIRGIN PETROLEUM PLASTIC BY 50% BY 2030 (UNCLEAR METHODOLOGY, BUT SAYS THIS MEANS REDUCTION OF 300,000 TONNES OF VIRGIN PLASTIC).	NO OVERALL FIGURE GIVEN ON ITS WEBSITE, BUT 6.3% IN 2018/19 GIVEN TO AS YOU SOW; REPORTING PATCHY ACROSS DIFFERENT BRANDS AND GEOGRAPHIES.	DIFFERENT TARGETS AND TIME FRAMES FOR DIFFERENT BRANDS.
	 UK  NETHERLANDS	60.1	COMMITTED TO 'HELP COLLECT AND PROCESS MORE PLASTIC PACKAGING THAN [THEY] SELL' BY 2025, AND OFFERS QUALIFIED SUPPORT FOR WELL-DESIGNED DRS, BUT DOES NOT CALL FOR MANDATORY LEGISLATION.	REUSE DELIVERY MODELS IN PLACE FOR SOME LINES OF PRODUCTS OR PACKAGING TRIALLING LOOP AND ALGRAMO.	TARGET OF 25% BY 2025 FOR ALL PLASTIC PACKAGING.	DO NOT APPEAR TO BE INDISCRIMINATELY REPLACING SINGLE-USE PLASTIC WITH SINGLE-USE ALTERNATIVES.	700,000	NEW COMMITMENT MADE IN OCTOBER 2019 TO REDUCE VIRGIN PLASTIC PACKAGING BY 50% BY 2025, WITH 100,000 TONNES COMING FROM ABSOLUTE REDUCTION.	CURRENTLY LESS THAN 1% RECYCLED CONTENT IN PLASTIC PACKAGING. RECYCLED CONTENT DECREASED IN ABSOLUTE TERMS BETWEEN 2015 AND 2018.	TARGETS APPEAR TO BE APPLIED GLOBALLY, BUT CONTINUES SINGLE-USE, NON-RECYCLABLE SACHETS IN EMERGING MARKETS.

packaging is redesigned to be thinner, thus using less plastic – can decrease overall plastic use, it does not affect how that item would behave if littered; nor does it improve its chances of being recycled or collected. As such, lightweighting can undermine the reusability and recyclability of products, and can also be used to distract from the need to scale refill-or-reuse models.

Third, we examined whether a company openly reports its progress on the total percentage of recycled content in its plastic packaging.

Finally, we looked at whether commitments were applied consistently across all markets in which the company operates. Companies need to ensure there is no contradiction between their actions on the issue of plastic pollution in one market as compared to another, and should be setting their own ambitious global standards to tackle plastic pollution across all geographies in which they operate.

Companies scored poorly in this part of our analysis if they failed to disclose their plastic footprint or their progress against targets; tried to confuse or spin figures on absolute reduction in plastic-packaging units or total percentage of recycled content (for example, by reporting figures from certain geographies, rather than total figures); or had historically changed the language and goalposts of their voluntary commitments in these areas.

2.2. Individual company initiatives

2.2.1. Coca-Cola

Coca-Cola produces by far the largest volume of plastic of any company globally – 2.9 million metric tonnes – and also, unsurprisingly, the most plastic waste.¹⁵ In 2019, as a signatory of the EMF New Plastics Economy Global Commitment, Coca-Cola finally disclosed its plastics footprint: 200,000 bottles per minute, and around one-fifth of the world’s PET-bottle output.¹⁶ Coca-Cola also ranked top of the plastic-polluting companies in the Break Free From Plastic audits in 2018 and 2019; 12,000 Coca-Cola products were found in litter clean-ups in 37 countries.¹⁷ A recent Tearfund report also found that Coca-Cola was the worst polluter it assessed, responsible for 200,000 tonnes of plastic pollution per year – the equivalent of 33 football pitches every day, or 4.6 million tonnes of GHG emissions from burning, across the six countries investigated.¹⁸



Credit: Les Stone

A flurry of voluntary initiatives

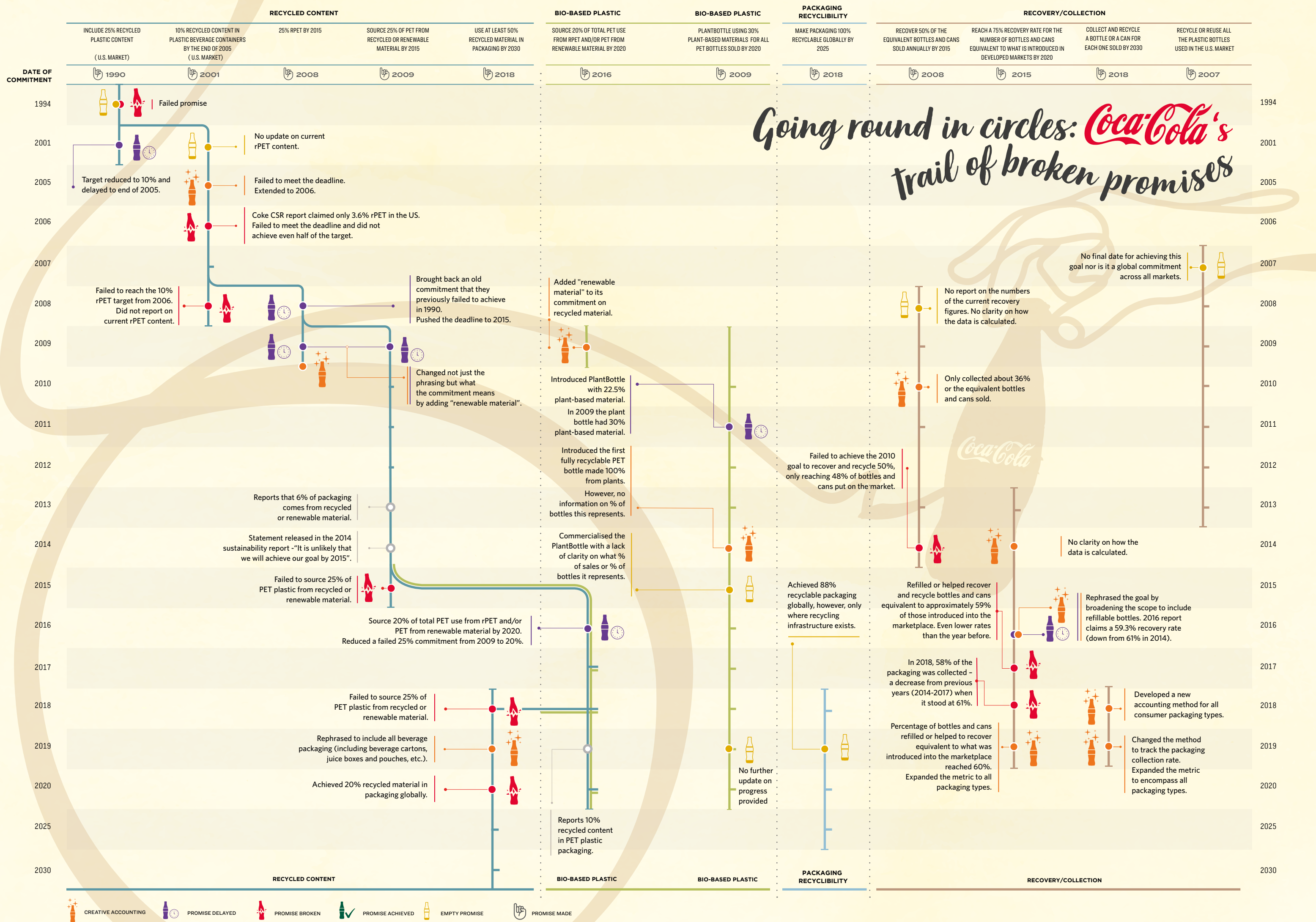
In Coca-Cola’s 2018 Business and Sustainability Report, the company set the aim to collect the equivalent of 100% of their packaging sold by 2030.¹⁹ However, it is unclear exactly how the company intends to achieve this collection target globally, and there is no mention of calling for legislation to mandate over 90% separate collection of plastic bottles. Although it seems Coca-Cola Western Europe and Coca-Cola European Partners have reluctantly committed to supporting ‘well-designed deposit return systems across Western Europe, where a successful proven alternative does not already exist,²⁰ – and, recently, Coca-Cola USA said similar in the survey As You Sow²¹ – this is not a coherent company policy, nor one that spans all markets, as will be demonstrated in Chapter 4.

Previously, Coca-Cola has perceived such legislation as a risk to its business, and has proactively lobbied against packaging regulation around the world. A leaked 2015 Coca-Cola strategy document revealed plans to ‘fight back’ against proposed regulation in Europe, and investigative research uncovered the company’s extensive lobbying against the initial plans for a deposit return scheme (DRS) in Scotland (see section 4.7).²² Evidence also shows that Coca-Cola still actively opposes mandatory collection and DRS in some locations; for example, the US state of Georgia (as recently as 2019)²³ and Kenya.²⁴



Coca-Cola plastic pollution in the environment

Credit: David Mirzoeff



Confusingly, Coca-Cola uses different language for reporting collection rates, stating that 60% of its packaging - including that made from plastic, aluminium and glass - was collected in 2019.²⁵ This figure has marginally increased compared to previous years (2015-17), when it stood at 59%.²⁶ However, Coca-Cola is not totally transparent about how this figure is calculated, nor how it breaks down into individual packaging types or by country.

Coca-Cola also commits to using at least 50% recycled material in its packaging by 2030.²⁷ Currently, the company reports that recycled content makes up 10% of its total plastic-packaging volume.^{28,29} However, Coca-Cola has had targets on minimum recycled content in bottles as far back as 1990, and, so far, has failed to meet them. In its 2008/9 Sustainability Review, the company's target for rPET in their bottles was 25% by 2015; no progress towards the goal was mentioned.³⁰ In its 2010/11 Sustainability Report, the company maintained its goal of 25% but redefined the target to 'recycled or renewable' content by 2015. The 2014/15 report claims Coca-Cola used 12.5% recycled or renewable content, but its 2016 Sustainability Report does not even mention the goal. Today, some of the company's brands are sold in bottles made with rPET, but it is unclear how Coca-Cola plans to achieve its new target of 50% recycled material across all its packaging by 2030 - or whether it simply intends to shift the goalposts again.

2.2.2. Colgate-Palmolive

Colgate-Palmolive has a plastic footprint of just over 287,000 metric tonnes from its business: producing household and personal-care products, food products, and health care and industrial supplies.³¹ The Break Free From Plastic Audit 2019 identified the company as the eighth-biggest plastic polluter worldwide, and the second-biggest polluter in Africa.³²

Colgate-Palmolive's commitments on tackling plastic pollution are relatively sparse. There is no discussion of collection of plastic packaging or calls to support legislation to mandate separate collection. Even the company's strategy for achieving its minimum recycled-content target appears to focus on 'procurement of more recycled content' without corresponding support for mandatory collection.³³



Colgate-Palmolive plastic pollution

Credit: Shutterstock

There is also very little detail about the company's development of reuse-and-refill systems, apart from mentioning it is participating in TerraCycle's Loop initiative with reusable packaging in the first half of 2020;³⁴ at present, however, this appears to be on a small and experimental scale, rather than a reuse-and-refill system for a significant proportion of Colgate-Palmolive products.³⁵

The company has a minimum recycled-content target of 25% in all its plastic packaging by 2025. It reports to the New Plastics Economy Global Commitment that its current use of recycled content is 7% of their total plastic packaging. However, the recycled content appears to vary according to the market, and overly focuses on a few brands: 'In Latin America, we increased recycled content in PET bottles to 50% (from 0% and 25%) in four types of bottles. Validating bottles with recycled content across the world and divisions, to include some brands up to 100%.³⁶ Misleadingly, Colgate-Palmolive states a higher figure - 'approximately 45% of our packaging materials by weight globally now come from recycled sources' - on its website, even though the figure is only 7% for plastic.³⁷

While Colgate-Palmolive says it has 'long been minimizing the volume and weight of [its] packaging',³⁸ there is no mention of an absolute reduction of single-use plastic in units. The company's focus on reduction is set firmly on lightweighting measures in a few brands and particular geographies. For example, it highlights reducing the weight of a Palmolive hand-soap bottle in Italy, the weight of the Suavitel bottle in Mexico and the weight of the cap on Colgate toothpaste in Poland - an unimpressive track record, considering its total tonnage of packaging.³⁹ The company is also keen to highlight projects that will 'transform [its] packaging portfolio' - such as introducing 'shrink sleeves with perforated tear tabs' and directing consumers to remove the sleeve at end-of-use to improve bottle recycling⁴⁰ - and the introduction of a recyclable high-density polyethylene (HDPE) toothpaste tube. However, the latter retails at six times the price of regular Colgate toothpaste, with roll-out of fully recyclable tubes across all brands only happening by 2025.⁴¹ It is not clear whether these recyclable tubes contain recycled content themselves.

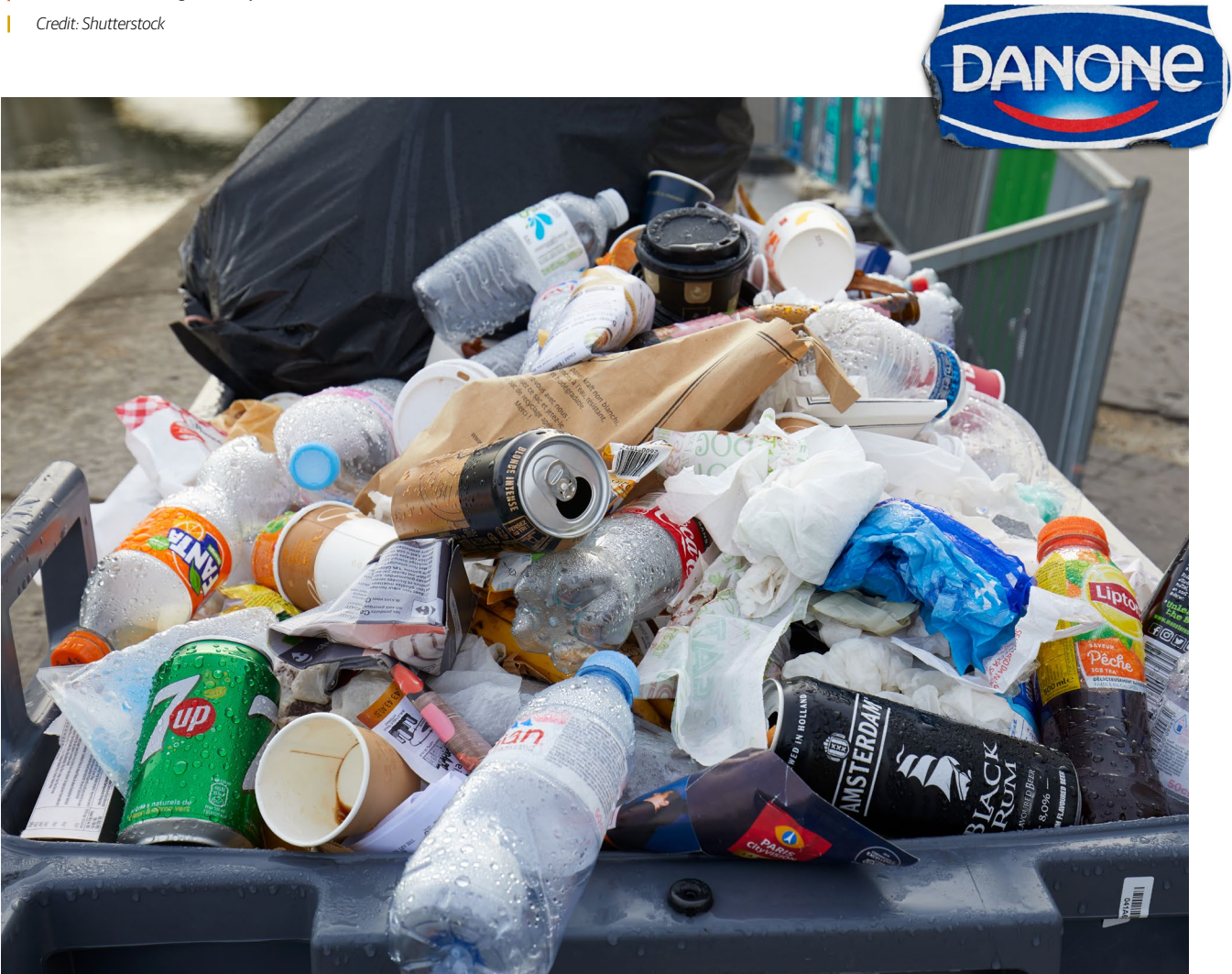
2.2.3. Danone

Danone is a French multinational; its product ranges cover infant nutrition, water, and dairy- and plant-based products, and its well-known brands include Activia, Alpro, Aptamil, Nutricia, Evian and Volvic.⁴² The company has declared its plastic footprint as 820,000 metric tonnes, and has published a breakdown of its packaging portfolio by material and packaging type.⁴³ It said that, in 2017, 86% of its total packaging (and 77% of plastic packaging) was already reusable, recyclable or compostable.⁴⁴ The company was identified as the fourth-biggest global plastic polluter in the 2018 Break Free From Plastic Audit, but did not feature in the top ten in the 2019 audit.⁴⁵ Nevertheless, as a multinational, fast-moving consumer-goods (FMCG) company with a significant plastic footprint, we have chosen to include Danone in this analysis.

Danone appears to be one of very few companies that explicitly reference the need for effective collection systems and express support for DRS, which is commendable.⁴⁶ Danone also says it will help to meet - or go beyond - mandatory-collection targets, as set by regulators worldwide. To meet the EU's target of 90% collection for beverage bottles, the company outlines its support for 'the most effectively publicly organised schemes, including Extended Producer Responsibility and deposit return systems'.⁴⁷

Despite being more explicit than many other companies on the importance of strengthening systems for collection - and stating that, by 2025, its 'goal is to have initiated or supported collection and recycling initiatives in each of our top 20 markets'⁴⁸ - it is nevertheless disappointing that Danone neither call for over 90% mandatory separate collection of bottles in all geographies nor pledges to support DRS schemes globally, despite DRS being proven to be the most effective way to achieve such high rates of separate collection. It seems Danone is only willing to support such targets in regions where regulators have already made the first move. Therefore, we encourage the company to adopt a coherent global policy, calling for mandatory-collection legislation around the world.

When it comes to reduction, Danone committed only to halving the amount of virgin plastic used in its water brands, and it seems its plan to achieve this largely revolves around switching to rPET.⁴⁹ Danone reports that half of its water volumes and one-third of the whole business is sold in reusable packaging, while 8.3% of its total packaging is reusable.⁵⁰ It seems that part of the reference to volumes applies only to large water coolers,^{51,52} and it remains unclear whether this packaging is theoretically reusable or is actually being reused through alternative delivery models. As with 'recyclability', reusability targets can only be said to have been met when packaging is not



only reusable by design but also part of a system through which it is able to be collected and reused in practice. The company outlines its goal of developing, by 2025, reuse and alternative delivery models that eliminate the need for single-use packaging;⁵³ so far, however, it seems to only be piloting new returnable-packaging models for Evian water, via TerraCycle's Loop initiative.⁵⁴

Danone has set an average minimum recycled-content target of 25% for all plastic packaging, and an average of 50% recycled material for water and beverage bottles, by 2025. It reported having 14% rPET in water bottles in 2018, in countries where this is allowed. It also says Evian bottles will be made from 100% rPET by 2025, and that 100% rPET bottles will be introduced to its main markets by 2021, although it is unclear which brands this refers to.⁵⁵ These targets seem to be more ambitious than those of their competitors; as such, it is confusing why the company is simultaneously investing in bio-based plastic without any clear sustainability criteria. The company currently reports having reached 6.4% recycled material in its total volume of plastic packaging; this has increased from 5.3% in 2017, which they attribute to the increase of rPET.⁵⁶

The company reports plans to eliminate single-use plastic straws and cutlery by 2025,⁵⁷ and highlights a pilot scheme assessing alternatives to plastic straws with its Indonesian brand, Aqua.⁵⁸ However, there is very little detail about how the single-use-plastic items will be eliminated, or whether they will be replaced with another single-use material. Danone has also committed to phasing out all PVC and PVDC from packaging by 2021.

Plastic pollution of a
Mars Incorporated brand
Credit: Shutterstock

2.2.4. Mars Incorporated

Mars Incorporated is a privately owned US multinational company, well known for manufacturing confectionary such as Mars bars, Milky Way, M&M's, Snickers and Skittles. It also produces Uncle Ben's rice, Dolmio sauce, Pedigree pet food, Whiskas pet food, Wrigley's gum and more than 50 other global brands.⁵⁹ Mars declared its plastics footprint as 184,000 metric tonnes,⁶⁰ and was identified as the sixth-worst polluter, in the Break Free From Plastic 2019 Audit.⁶¹

Mars mentions collection and sorting systems as crucial to ensuring its packaging is reusable and recyclable, and acknowledges the need for 'the recycling and regulatory environment to evolve in significant ways'.⁶² However, the company does not expand further with details of how they would like to see the regulatory environment evolve; nor does it allude to the companies' responsibilities to collect the plastic they place on the market, nor call for over 90% mandatory separate collection of plastics in all markets.

Mars talks about the opportunity to develop new business models for reuse, and has pledged to have at least 10 reuse programmes in markets by 2025, although the New Plastics Economy Global Progress Report states reuse delivery models are only in place for a small proportion of its products.⁶³ Like several other multinational companies, Mars is keen to highlight its current partnership with TerraCycle's Loop initiative as its primary foray into developing reuse models; however, how this initiative will be scaled up remains to be seen.⁶⁴

Mars also committed to including 30% average recycled content across its portfolio of plastic packaging by 2025. While this is slightly further reaching than many other companies, the convenient use of the word 'average' indicates not every item of plastic packaging will contain at least 30% recycled content. The other concern here is that Mars currently says none of its plastic packaging contains recycled content, and plans to achieve its target entirely based on chemical recycling - a false solution (see Box 3.1). This suggests Mars is primed to roll back on its voluntary recycled-content target without a significant technological breakthrough in chemical recycling.

Mars commits to making 100% of its plastic packaging reusable, recyclable or compostable by 2025 - as do many other companies. However, it should be noted that it is starting from a current figure of 19%, and therefore has a lot of ground to make up. As part of this, the



company is conducting research into biodegradable and compostable packaging materials; but its approach is unclear, and the proposed applications for these materials are unknown.⁶⁵ Furthermore, Mars has missed these sustainability targets in the past; in 2007, it pledged to design its packaging to be 100% recyclable or 'recoverable' by 2015, but only managed to achieve 89% by the deadline.⁶⁶

The company also pledges to eliminate single-use plastic straws by 2020,⁶⁷ but appears to be replacing plastics with other single-use materials, such as paper. For example, in the UK in 2019, Mars replaced the plastic wrapper and carton in a Maltesers Truffles Treat pack with cardboard; in 2020, the company will 'test the use of more paper packaging materials where we can replace plastics with paper'.⁶⁸

Finally, although Mars has announced targets of a 25% reduction in virgin plastics used in its packaging by 2025 (versus today's tonnages), this does not appear to be in terms of absolute reduction of the total number of single-use plastic-packaging units. Meeting this target seems to be heavily dependent on immature - and questionable - chemical-recycling technology.⁶⁹

2.2.5. Mondelēz International

Mondelēz is one of the world's largest snack-food companies, with key brands including Belvita, Oreo, Ritz, TUC, Toblerone, Cadbury, Green & Black's, and Trident. It joined the New Plastics Economy Global Commitment in March 2020, but has not provided any details about its plastics footprint. Nevertheless, the company was the fourth-worst offender in the Break Free from Plastics 2019 Audit, and its non-recyclable pouches of Tang fruit drink were the most frequently collected type of waste packaging on beaches in the Philippines in 2017.⁷⁰

Mondelēz makes no mention of supporting legislative measures that would mandate separate collection of plastic packaging, and nowhere in its 2019 Impact Report does it mention recycled-content targets for plastic packaging,⁷¹ although an article announcing its joining of the EMF New Plastics Economy Global Commitment points to a pitiful target of just 5% by weight.⁷²

The company does talk about its target of eliminating 65,000 metric tonnes of packaging by 2020 (compared to a baseline in 2013), and reports it is on track, having already eliminated 64,850 metric tonnes.⁷³ However, without further information, it is difficult to know whether this reduction refers to an absolute value and would continue irrespective of a growth in sales. It's also notable that this reduction does not specifically refer to plastic, but rather packaging more generally - and, without further transparency on the company's plastic footprint, it's very difficult to tell how this figure relates to its overall plastic production. In short, too much context is being hidden for this figure to be anywhere near meaningful.



Plastic pollution of a Mondelēz International brand | Credit: Zero Waste Europe

In October 2018, the company announced a new commitment to make all its packaging recyclable by 2025 and provide recycling information in markets around the world. Mondelēz claims this commitment is part of its 'strategy for a circular packaging economy' by 'making it easier for consumers to recycle'.⁷⁴ It also reported being on track to reach 100% recyclable packaging by 2025, with 90% 'recyclable or recycle-ready' in 2018.⁷⁵ However, as mentioned earlier in this chapter, this strategy completely fails to address the issue that 'recyclable' does not necessarily mean the product is, in practice, recycled. Since mandatory collection of packaging is a basic precursor to recycling or reuse, Mondelēz cannot possibly guarantee its packaging is recycled, without any commitment or detailed proposals for collecting the packaging it puts on the market. Concerningly, Mondelēz is looking to chemical recycling - which is, as mentioned, an unproven and environmentally dubious technology (see Box 3.1) - to meet recycled-content targets in its Philadelphia cream-cheese packaging.⁷⁶

As part of this commitment, the company claims to be supporting improvements of waste-management infrastructure and recycling rates; however, it is not clear exactly how. Mondelēz was also assessed very poorly for its stance on producer responsibility and packaging transparency, according to recent surveys by As You Sow.⁷⁷ Overall, Mondelēz has very weak commitments, with scant detail and a heavy emphasis on recyclability and chemical recycling.

2.2.6. Nestlé

Nestlé has publicly disclosed its plastic footprint as 1.7 million metric tonnes per year,⁷⁸ although Greenpeace Switzerland recently criticised the company for failing to disclose complete, clear and comparable information on plastic reduction.⁷⁹ Nestlé was also the second-worst offender in the Break Free From Plastic Audit 2019.⁸⁰ Tearfund reports that Nestlé's plastic pollution footprint is 95,000 tonnes a year across just six countries - enough to cover 15 football pitches every day.

In the company's 2019 Creating Shared Value progress report, product packaging and plastic are identified both as holding a significant degree of stakeholder interest and having a major impact on Nestlé's business success.⁸¹ Nevertheless, although Nestlé supports mandatory EPR,⁸² it does not specifically call for global legislation to mandate over 90% separate collection of plastic bottles, and only mentions a collection target in relation to the company's membership of the European Federation of Bottled Waters (EFBW), which pledged in May 2018 to collect 90% of all PET bottles by 2025.⁸³



Plastic pollution of a Nestlé brand | Credit: Kate Ter Haar

In 2008, Nestlé Waters NA voluntarily committed to doubling recycling targets for PET bottles to 60% by 2018. By that deadline, the rate was less than half the goal (28.9%), with an average rate of 29.6% over the past 10 years – a large shortfall in ambition, showing almost no progress over the course of the commitment. Nestlé claimed to have set a high target to encourage other industry players to follow suit, but that this call to action was never taken up. Since then, the company’s focus has shifted to increasing recycled content, even though high collection and recycling rates are one of the main stimuli for making recycled content competitive.⁸⁴

According to the 2019 New Plastics Economy Global Commitment report, Nestlé has a global target to use 15% of recycled material in its packaging by 2025. The company takes care to highlight specific brands of beverage bottles in which rPET is used in higher percentages across different markets; overall, however, Nestlé reports that recycled content makes up a lowly 2% of its total plastic-packaging volume, and 5% recycled content in PET water bottles.⁸⁵ Nestlé recently committed to reducing virgin plastic by one-third by 2025, and to invest 2 billion Swiss francs (CHF) to buy food-grade recycled plastics and accelerate innovative sustainable-packaging solutions, such as refill options.⁸⁶

Although Nestlé has, to date, invested 8 million CHF in reuse models – such as for Purina pet foods, and as a member of TerraCycle’s Loop⁸⁷ – this has only been in high-income countries. The company also reports that, globally, 20% of its water products are sold in refillable and returnable formats, and that it has made dispensers for Nescafé and Milo available in over 20 countries across Asia, Latin America, Africa and the Middle East⁸⁸ – but this translates into just 1% of its packaging being reusable, and 64% recyclable. Meanwhile, the company continues to sell its products in single-use and non-recyclable sachets, predominantly in emerging markets, where waste facilities are unable to cope.⁸⁹ Although it states an ambition to create a ‘one tonne in, one tonne out’ principle for countries with high leakages of plastic into the environment, thus far, this is a paper promise with no specificity or timeline.⁹⁰

Furthermore, Nestlé appears to be heavily focusing on substituting single-use plastic items with other single-use materials. For example, Nestlé began phasing out plastic straws in February 2019, but appears to be achieving this by switching to other single-use materials, such as paper.⁹¹ The company rolled out paper-based packaging globally for Nesquik in the first quarter of 2019, switched from plastic to paper for its Yes! and Smarties packaging later in 2019, and plans to introduce paper-based pouches for Milo in 2020.⁹²

In 2019, Nestlé also set up the Institute of Packaging Sciences to ‘pioneer environmentally friendly packaging materials’,⁹³ and committed to relatively quick phase-out of problematic non-recyclable materials such as PVC. Nestlé states it is researching marine-biodegradable and compostable polymers, which are also recyclable, for use in water bottles in areas where recycling infrastructure does not yet exist. The company has partnered with Danimer Scientific to develop such a bottle, sold under the brand name Nodax.⁹⁴ It is unclear why the company is focusing its efforts on this – rather than on increasing collection and recycling infrastructure – to reach its commitment, as capture rates for bottles of over 90% are frequently achieved in countries with successful DRS.

2.2.7. PepsiCo

PepsiCo is the third-largest FMCG company (by revenue),⁹⁵ and the third-worst offender in the Break Free From Plastic 2019 Audit, with 3,362 pieces of plastic found in 28 countries.⁹⁶ It has disclosed a plastic footprint of 2.3 million metric tonnes per year, closely following Coca-Cola.⁹⁷ Tearfund reports that PepsiCo is responsible for 137,000 tonnes of plastic waste per year across just six countries – equivalent to 22 football pitches every day.

In its 2018 Sustainability Report, the company says it is its ‘business imperative to help build a circular future for packaging and a world where plastics need never become waste’.⁹⁸ Yet nowhere does PepsiCo mention the need to take responsibility for collecting the plastics they put onto the market, and neither do they call for legislation to mandate over 90% separate collection of plastic bottles. The nearest PepsiCo comes to mentioning collection of beverage bottles is a partnership initiative in India, where RVMs and other collection points are utilised across Delhi to enable the collection and recycling of PET bottles.⁹⁹ However, unless PepsiCo takes steps to bring collection initiatives to scale – through support for global legislation for 90%+ separate collection, and by acknowledging that mandatory DRS are the only proven and effective way to achieve a high rate of collection – this voluntary initiative might be a good PR move, but does little more than pay lip service to the importance of collection. Additionally, PepsiCo still remains opposed or neutral to deposit systems, having previously been a strong opponent of bottle bills in the US, and opposed to government-mandated EPR and policy mechanisms,



such as additional fees on single-use plastics.¹⁰⁰

In a voluntary commitment in 2010, PepsiCo set itself the goal of increasing the US beverage-container recycling rate to 50% by 2018. With failure in sight in 2017, the organisation was encouraged by shareholder advocacy non-profit, As You Sow, to acknowledge the shortfall and propose a new plan. The resultant report avoided explicitly taking responsibility for the failure, and replaced its ambition with a goal to ‘work to increase recycling rates’. However, in early 2018, it became apparent that this plan largely comprised of a \$10 million donation to the Recycling Partnership (RP) (see section 4.2.5).¹⁰¹

PepsiCo has a target to increase recycled content to 25% by 2025 in all its plastic packaging, and to 50% rPET content in the EU by 2030. On its website, the company highlights its progress and claims that 9% rPET is used across its company-owned beverage portfolio in the US, and 21% in company-owned beverage operations in Western Europe.¹⁰² At first, this may seem like a high rate compared to other companies; however, this reporting has been carefully selected to hide the pitifully low level of recycled content used overall. According to PepsiCo’s 2019 Sustainability Report, recycled content currently makes up just 4% of its total plastic packaging, barely increasing from 3% in 2018.¹⁰³

In 2019, the company announced that, as a step towards meeting its recycled-content target, the LIFEWTR brand in the US would be made from 100% rPET. This is wildly unambitious, given how many plastic beverage bottles the company produces, and given that making plastic bottles from 100% recycled content is not only technologically feasible but has also been rolled out by a number of companies over the past few years. Blaming ‘insufficient supply of recycled material’ is not good enough, and does not stand up to scrutiny, when effective systems already exist to collect and process clean streams of rPET for use in beverage bottles.¹⁰⁴

PepsiCo committed to a 20% absolute reduction in virgin plastic across its beverage portfolio by 2025 (compared to a 2018 baseline), which was subsequently increased to 35% in 2019.¹⁰⁵ This will be driven by recycled content, new reuse-and-refill delivery models, and replacing virgin plastic with alternative materials. However, only a 1% reduction was made in 2019.¹⁰⁶ Part of this was its acquisition of SodaStream in 2018; PepsiCo announced it would expand the business and could lead to the avoidance of 67 million plastic bottles by 2025, as well as the exploration of refill-and-reuse pilots on college and corporate campuses.¹⁰⁷ However, it appears PepsiCo is also looking to meet its recycled-content commitments through chemical-recycling technology, as suggested by its investment into Loop Industries (a separate company from TerraCycle's Loop initiative), thus relying on unproven false solutions rather than supporting mandatory collection and mechanical recycling.¹⁰⁸

PepsiCo has committed to 100% of its packaging being recyclable, compostable or biodegradable by 2025. To achieve this, the company is testing industrially compostable snack packaging, and claims to be investigating the feasibility of a film that is 'fully biodegradable regardless of how it is disposed of'.¹⁰⁹ However, creating a material that will both be suitable as a packaging material and biodegrade in a reasonable timeframe in any environment is a challenging goal - and one with potentially unknown environmental implications. PepsiCo has indicated it will look to compostable plastics to resolve issues around its 15% of products in multi-laminated flexible packaging, a material that is practically impossible to recycle. However, relying on compostable packaging while access to industrial composting is limited in many markets means many of these products will still end up in landfill.¹¹⁰



Credit: Les Stone

Plastic packaging of a Perfetti Van Melle brand
Credit: Shutterstock



2.2.8. Perfetti Van Melle

Perfetti Van Melle is a privately owned confectionary and gum manufacturer with products in over 150 countries. Key brands include Chupa Chups, Fruitella and Mentos.¹¹¹ The company was named one of the top ten global plastic polluters in both the 2018 and 2019 Break Free From Plastic audits.¹¹²

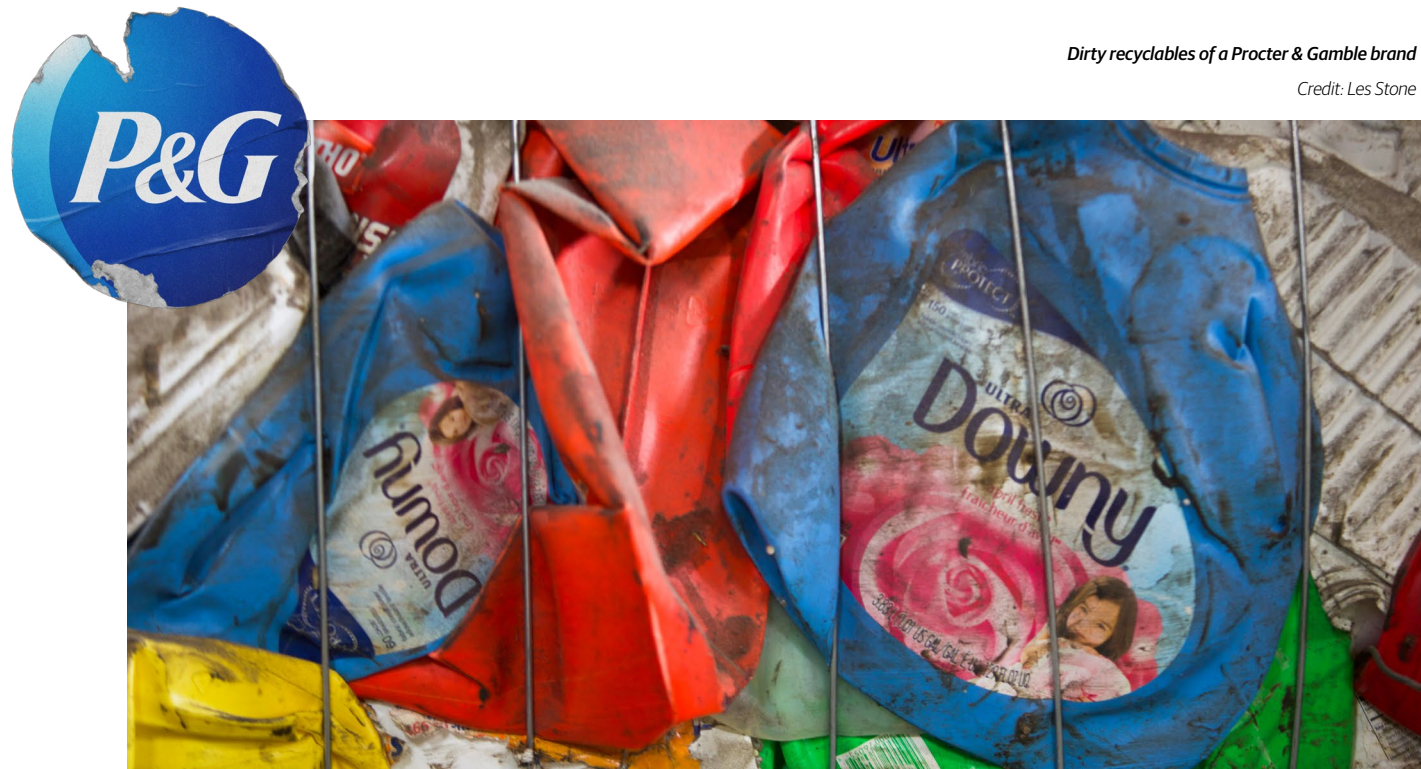
Perfetti Van Melle was one of the worst companies we assessed in terms of transparency. Only one of its global CSR report is available (from 2016); despite promising to publish its next report in 2018, we did not discover anything more recent. Perhaps unsurprisingly, then, Perfetti Van Melle does not report its plastic footprint. The company also gives extremely little detail on any other aspect of plastic packaging, which would be prudent for any company named one of the biggest global plastic polluters two years in a row.

There is no mention of collection of plastic packaging, zero reference to developing reuse models, no word on minimum recycled-content targets, and otherwise generally vague and non-specific wider commitments with scant detail.¹¹³ For example, the company says it aims to 'develop more fit-for-purpose packaging solutions' and 'optimise the weight and volume' of its packaging, but without providing any targets or plans for how they will achieve this. This leads to the conclusion that Perfetti Van Melle does not take the issue of plastic pollution seriously at all; indeed, it seems to be off their radar as a critical sustainability issue.

The only vaguely relevant number provided in the company's 2016 global CSR report relates to the weight reduction of bottles, which resulted in 80,000kg less plastic being used on a yearly basis from mid-2017. Lightweighting is not an ambitious activity, compared to an absolute reduction in the total number of single-use plastic-packaging units, and 80,000kg seems a small amount for such a big plastic polluter. While Perfetti Van Melle has committed to investing in alternative technology research, to date, there is no publicly available information on any specific technology the company is investing in, and absolutely no evidence that it is moving towards better alternatives.¹¹⁴

2.2.9. Procter & Gamble

Procter & Gamble (P&G) is a huge, multinational consumer-goods corporation, listed by EMF as the second largest FMCG in the world (by revenue).¹¹⁵ Its household brands include haircare (Aussie, Pantene, Herbal Essences, Head & Shoulders); grooming (Braun, Gillette, Venus); sanitary products (Always, Tampax); laundry detergents (Ariel, Bold, Daz, Lenor); and baby care (Pampers).¹¹⁶ The Break Free From Plastic Audit lists P&G in the top ten global plastic polluters in both 2018 and 2019.¹¹⁷



P&G is not a signatory of the *New Plastics Economy Global Commitment*, and does not publicly disclose its plastic footprint in company's communication materials. The company's sustainability goals for 2030 include reducing its global use of virgin plastic in packaging by 50%. If it manages to do so, it will avoid using 300,000 tonnes of plastic.¹¹⁸ According to the company's response to As You Sow, its plastics footprint was 714,000 tonnes in 2018/19; their commitment to 300,000 tonnes of plastic reduction therefore translates to just 42%. As You Sow also reports that P&G made a commitment to 100% recyclable packaging after engaging with them, but P&G's commitment is for 2030 – five years later than many other FMCGs. Edie reports that, currently, '86% of its product packaging is either recyclable or that programmes are in place to create the ability to recycle it'.¹¹⁹

P&G has made no commitments regarding collection, and neither calls for legislation in this area nor mentions support for DRS. It highlights different targets on its US environmental sustainability webpage¹²⁰ than on its UK equivalent.¹²¹ At the time of writing, there was no reference to the development of reuse-and-refill delivery models for P&G products on their UK site;¹²² on its US site, however, the company highlights its 2019 participation in test programmes with TerraCycle's Loop project in New York and Paris,¹²³ in which its brands Pantene, Gillette and Venus were included.¹²⁴



Gillette and TerraCycle 'recycling' advertisement

When it comes to reduction of virgin-plastic use, P&G states alternative materials will only be used 'when it makes sense', and that lightweighting, increasing recycled content and moving towards more concentrated products will take priority.¹²⁵ However, this does not appear to involve an absolute reduction in the total number of single-use plastic-packaging units. It is also unclear what instances the company will consider using alternative materials in, and which types of materials. In another document on the company's brand criteria for 2030, it states it will achieve 'a meaningful increase in responsibly-sourced bio-based, or recycled or more resource efficient materials';¹²⁶ however, this commitment is nebulous because it does not include an actual target, timeframe or more detail on what 'responsibly-sourced' means.

When it comes to minimum recycled content, P&G talks about 'continuously innovating with recycled plastic',¹²⁷ and, according to As You Sow, has a recycled-content target of 8% for 2025.¹²⁸ This is a very modest increase – from 6.3% in 2018. As part of the European Circular Economy Stakeholder Platform, P&G has pledged to increase recycled resin usage for PE and PET packaging in Europe by an additional 25 kilotonnes by 2025.¹²⁹ Rather than their modest overall rate, however, the company prefers to report its recycled content for individual brands. For example, in February 2020, P&G announced that Ariel liquid detergent bottles in Europe would reach 50% recycled content by the end of the year,¹³⁰ while the content of recycled material in Mr. Proper and Viakal surface cleaners would increase from 20% to 70% by 2020.¹³¹ However, the company's reporting on these varied targets – in different geographies and for different brands – is patchy, and it is difficult to ascertain how they are measuring progress, or what is happening with products sold in other markets. Rather than robust reporting, the company seems to be interested in marketing its commitments. For example, P&G created a headline-grabbing pilot project to manufacture a Head & Shoulders bottle, partly produced from ocean plastic that was collected by volunteers in a clean-up in France, in partnership with TerraCycle. They made an attractive video, *Recycling the Unrecyclable*,¹³² in which they talked about changing all its bottles in Europe to recycled plastic by 2018 (more than half a billion bottles, containing 25% recycled plastic). The video ended with the CEO of TerraCycle saying: 'this project with Head & Shoulders is the most significant solution to marine plastic that we have ever seen in the world, but it's just the beginning'.

This makes it sound like P&G was planning to replace 25% of all plastic in its European Head & Shoulders bottles with recycled marine plastic, which would have been a significant goal to achieve in just one year. A story published later on the Head & Shoulders website shows that the project in France resulted in 150,000 recyclable shampoo bottles made from plastic pollution, and that the company then took this project to 10 other countries, resulting in around 1 million bottles from 6 tonnes of plastic collected on the beaches.¹³³ Although P&G says it has increased the percentage of recycled plastic to 25% in Head & Shoulders, Pantene and Aussie shampoo brands in Europe,¹³⁴ it does not say what happened to its commitment to change all its bottles in Europe to recycled plastic – and it is unclear whether the bottle is fully made of ocean plastic or mixed with virgin material, as implied in the video. The company made a similar headline-grabbing commitment with Fairy washing-up liquid, which was supposed to contain 10% ocean plastic by 2018.¹³⁵ P&G was one of the few FMCGs founding members of the Alliance to End Plastic Waste (see section 2.3.1), which mostly focuses on end-of-pipe solutions; its CEO is now the Chairman of the Alliance.¹³⁶



Head & Shoulders bottle made out of recycled beach plastic |



Plastic packaging of Procter & Gamble brands |

P&G also has a history of changing the goalposts on its voluntary commitments. For example, in 2010, the company made a specific commitment to replace 25% of its petroleum-based materials with sustainably sourced renewable materials by 2020; however, the company did not report progress towards the target. Additionally, in its 2015 sustainability report, the wording of the commitment was changed to a much less stringent one: 'create technologies by 2020 to substitute top petroleum-derived raw materials with renewable materials as cost and scale permit'.¹³⁷ In 2018, P&G claimed it had achieved this goal, but there has been no further mention of the original pledge.¹³⁸

2.2.10. Unilever

Littered items including Unilever brands

Credit: Shutterstock



Unilever is the fifth biggest FMCG company (by revenue), with sales in over 190 countries reaching 2.5 billion consumers each day.¹³⁹ The company produces 700,000 metric tonnes of plastic per year, as reported to the New Plastics Economy Global Commitment.¹⁴⁰ It has over 400 brands in its portfolio; key brands include Dove, Ben & Jerry's, Lipton, Cif and Omo. Unilever was the fifth-worst offender in the Break Free From Plastic 2019 Audit.¹⁴¹ In Tearfund's report, Unilever was responsible for 70,000 tonnes of plastic waste per year across just six countries – more than 11 football pitches every day.

Unilever has identified plastic packaging as a 'principle risk for [its] business',¹⁴² and has committed to 'help collect and process more plastic packaging than [it] sell[s]' by 2025. The company states this commitment will require it to collect and process around 600,000 tonnes of plastic annually by 2025, and that this will be delivered through 'investment and partnerships which improve waste management infrastructure' in many of the countries in which it operates.¹⁴³ Although it doesn't openly call for mandatory-collection legislation and DRS, Unilever offers qualified support, saying DRS should be 'well thought through' and avoid 'putting consumers off' with high deposit fees.¹⁴⁴ Interestingly, Unilever has highlighted the Lipton 'festival bottle', which is made from 100% recycled plastic and collected

using a deposit system in the Benelux region.¹⁴⁵ If Unilever believes this is a good idea, the company should actively support it as a solution – by backing mandatory collection globally and helping implement DRS on a larger scale.

Unilever is exploring several types of reuse models, although current pilot projects appear to be on a small scale and cover only a small proportion of products and packaging; for example, a small-scale pilot with three retailers in São Paulo, Brazil, to trial refillable Omo liquid detergent; and through Algramo in Chile, which is piloting a reuse-and-refill system using electric tricycles to deliver to people's homes.¹⁴⁶ Cif refill stations for shampoo and laundry detergent are being rolled out in shops, universities and mobile vending stations in South East Asia, and – like other companies – Unilever has signed up to TerraCycle's Loop platform.¹⁴⁷

Unilever products in a supermarket

Credit: Les Stone



As part of the New Plastics Economy, Unilever has pledged to use at least 25% recycled content in its plastic packaging by 2025. Similarly to other FMCG companies, Unilever says '*the biggest challenge is the limited availability of high-quality recycled waste materials, particularly in developing and emerging markets*'¹⁴⁸ – without supporting legislation for mandatory collection, which would help to achieve a clean stream of recycled plastic. Despite the commitment, Unilever is lagging in its progress towards achieving the target. In 2018, recycled plastic represented less than 1% of the total amount of plastic resin it bought.¹⁴⁹ The amount of post-consumer recycled content incorporated into Unilever's rigid plastic packaging actually decreased by 1%, in absolute terms, between 2015 and 2018 – from 4,900 tonnes to 4,845 tonnes.¹⁵⁰ In 2019, recycled-content inclusion was reported at 5% of rigid plastic packaging: 35,000 tonnes. This appears to represent a laudable increase; however, it is unclear from the company's reporting whether the figure is for all plastic packaging or just rigid plastic.¹⁵¹

Unilever has set a pioneering target to reduce its use of virgin plastic by 50% by 2025. The company has explicitly highlighted that it plans to do this by reducing its overall use of plastic packaging, with around a third coming from absolute reductions – more than 100,000 tonnes by 2025, through reuse, refill and packaging-free solutions. The remaining reduction will be achieved through increasing the use of recycled content.

Unilever does not appear to be indiscriminately replacing single-use plastic with single-use alternatives, and, where the company is exploring alternative materials (such as aluminium, glass and paper), it appears to be aware of potential unintended consequences and

environmental impacts. The company seems to be looking at different packaging formats and models of consumption first.¹⁵² Unilever has also produced a position statement on bio-based plastics, stating it will switch to bio-based alternatives if they show an equivalent or better life-cycle impact compared to fossil-based plastics, do not lead to competition for land that could be used for food crops and do not have a negative impact on traditional recycling infrastructure.¹⁵³ However, its Simple brand of face wipes do not appear to have biodegradability certifications, and the advice on the product is to send them to industrial composting – but acceptance of these types of products by composting plants is not widespread, and not all markets where the products are sold have access to such facilities. Unilever's commitments relating to bio-based, biodegradable and compostable plastics are relatively vague, but its approach is stronger and more sensible than other companies.

A persistent problem for Unilever is its multi-laminate plastic sachets, which represent 19% of its products.¹⁵⁴ These are practically impossible to recycle conventionally, and have created a massive pollution problem in South East Asia. The company seems to be relying on its newly developed Creasolv® technology at a plant in Indonesia – which appears to be a type of chemical recycling – but is experiencing obstacles due to the high volumes of sachets needing to be collected, as well as remaining technical issues. Finally, Unilever is not transparent about questions of toxicity relating to chemical recycling.¹⁵⁵

2.3. Alliances and group initiatives

Pledges and voluntary commitments to end plastic pollution are put forward by not only individual companies but also a wide range of industry-endorsed alliances, many of which have been specifically set up to tackle the issue of plastic waste. This section outlines some of the most prominent industry-backed alliances currently promoting their initiatives as the latest solution.

2.3.1. Alliance to End Plastic Waste



The Alliance to End Plastic Waste is an industry-led global alliance that launched in January 2019. To date, 47 companies have joined the Alliance, predominantly oil and gas companies, chemical and plastic manufacturers, consumer-goods companies, retailers and waste-management companies. Its members have pledged to invest \$1.5 billion over the next five years to tackle the plastic pollution problem.¹⁵⁶ Even the name of the group is designed to suggest plastic is only a problem when it has become waste, rather than acknowledging the problems across its life cycle.

The Alliance's strategy has four main components. First, it focuses on developing infrastructure, which appears to be centred on building the capacity of waste-management systems in low- and middle-income countries. Second, the Alliance aims to support technology that advances 'innovation for recycling and reuse'. The third strand focuses on educating consumers about the impact of plastic waste and how it can be collected. Finally, it emphasises cleaning up existing plastic waste in the environment.¹⁵⁷

Examples of projects that fit underneath each of these strands can be found on the Alliance website. In terms of developing infrastructure, it focuses not on getting companies themselves to take responsibility for collecting over 90% of the plastics they put on the market, but rather on building capacity for waste-management systems in low- and middle-income countries in South East Asia. Project STOP, which supports three cities in Indonesia to develop waste-management systems, is the Alliance's main example of its work under this strand. The project was originally set up in 2017 by two companies – plastics producer Borealis and consultancy SYSTEMIQ – but the Alliance only recently adopted and funded it as one of its flagship projects.¹⁵⁸ The Alliance also claims to be exploring collaboration with partners to scale up waste-infrastructure systems in India, the Philippines and Vietnam.¹⁵⁹

More recently, the Alliance partnered with African Parks to 'support a number of sustainable solutions such as education and improving waste management systems to reduce plastic leakage, and engagement activities such as beach clean-ups'.¹⁶⁰ This announcement acknowledges the scourge of plastic on natural ecosystems, without mentioning that members of the Alliance produce many of these items. The focus on parks and reserves also conveniently helps to clean up the problem in areas frequented by tourists, without addressing the severe harm posed to communities from toxic dumps of growing plastic waste choking cities across the continent.

Although the pledge of \$1.5 billion may seem a significant amount, this investment pales in comparison to the annual revenue of many members of the Alliance, including oil and gas giants Shell, ExxonMobil and Total, and huge consumer-goods companies PepsiCo and P&G. In fact, over a quarter of the industry members that are part of the Alliance generate an annual turnover exceeding \$45 billion, while Shell alone has a turnover of more than \$360 billion.¹⁶¹

The cumulative fund of \$1.5 billion earmarked for Alliance projects is not only small fry for these billion-dollar companies but also, crucially, dwarfed by their substantial and continued investment in new plastics production. Members of the Alliance also invested \$186 billion into new petrochemical facilities between 2010 and 2017, largely driven by increasing plastic production.¹⁶² The investment does not stop there. Recent updates from the American Chemistry Council (ACC) show that, in the US alone, more than \$202 billion has been earmarked for investment in 340 new projects consisting of new facilities, expansions and factory restarts, with experts projecting the plastics industry will have added 28 million tonnes of plastic production within this decade.¹⁶³ The ACC says that 19% of total investment (~ \$37.5 billion) is plastic resins and expectations are that U.S. exports of plastic to Asia will rise more than fivefold by 2020, with China as the primary destination.¹⁶⁴ This investment is expected to drive a 40% increase in global plastic production over the next decade.^{165,166}

Besides the obvious inconsistency of Alliance members pledging to tackle plastic waste while simultaneously investing billions to scale up global plastic production, its activities do not seek to meaningfully tackle the plastic problem at its source, instead primarily focusing on end-of-pipe measures by trying to stop plastic waste entering the ocean.

There are clear parallels between the Alliance to End Plastic Waste and KAB, a notorious not-for-profit organisation set up by the industry in 1953 to raise public awareness about littering and to promote recycling.¹⁶⁷ Both organisations have corporate members that are also major plastic polluters, with some companies involved in both organisations; for example, PepsiCo, Dow and many members of the ACC and Plastics Industry Association (PLASTICS).^{168,169} Both organisations lead with the message that plastic pollution is the responsibility of individual consumers, rather than the manufacturers and companies that keep producing it. Naturally, it suits the industry – oil and gas companies, chemical and plastic manufacturers, consumer-goods companies, retailers – to focus the debate around plastic waste on litter, caused by individuals and to be dealt with by local authorities, rather than on those who have systematically pushed ever more plastic products for decades.¹⁷⁰

Like KAB, the Alliance is just a rebranded effort to keep blaming the consumer for plastic pollution, this time in emerging and developing economies, primarily in South East Asia. The Alliance points to a 2015 *Stemming the Tide* report by the Ocean Conservancy and McKinsey Centre for Business and the Environment as its justification for focusing on South East Asia.¹⁷¹ This report states that China, Indonesia, the Philippines, Vietnam and Thailand accounted for up to 60% of plastic waste in the oceans due to an 'exploding demand for consumer products' – products that top plastic polluters have heavily marketed to these countries.¹⁷² Tellingly, the steering committee for this report included Coca-Cola, Dow Chemicals and the ACC.¹⁷³ The report was also criticised for using incomplete data, being designed to the inevitable expansion of global plastic production, and focusing on discredited waste-management techniques like incineration – rather than taking a regulatory approach to implementing mandatory collection and phase out problematic plastic products and packaging.¹⁷⁴

2.3.2. Trash Free Seas Alliance



The Trash Free Seas Alliance, an initiative of the Ocean Conservancy, 'unites industry, science and conservation leaders who share a common goal for a healthy ocean free of trash'.¹⁷⁵ Members include FMCG companies like Coca-Cola, Danone, Nestlé Waters, PepsiCo and P&G, as well as big plastic companies and packaging producers like Dow, Amcor and Hi-Cone.

As the author of the controversial *Stemming the Tide* report, Ocean Conservancy's recommendations focus on improving waste management in the countries it has identified as leaking high levels of waste plastic into the environment – and, while it mentions improving collection, it does not identify the mechanisms through which this should be achieved. Over 200 environmental organisations co-signed a letter criticising the report for its advocacy of incineration and other discredited waste-management methods.¹⁷⁶ An additional, technical critique called out the report's face-value acceptance of industry trends, which project a massive increase in plastic use as inevitable – even beneficial – without calling for redesign or reduction.¹⁷⁷

Tellingly, the organisation's International Coastal Cleanup initiative, which provides a large amount of data from beach cleans around the world on types and volumes of litter collected, fails to implicate a single brand in connection with the 97 million items of trash collected by over a million people in 2019. The only mention of corporates pertains to those that sponsor the initiative.¹⁷⁸ Without being forthright about that information, consumer brands are not held accountable for their role in the plastic pollution crisis.

The Alliance's goal is to 'create pragmatic, real-world collaboration focused on reducing the amount of plastic waste leaking into the ocean annually by 50% by 2025', which is to be achieved through a shared philosophy, including a focus 'on solutions with the largest impact on mitigating ocean plastic waste over the shortest amount of time'.¹⁷⁹ Interestingly, its website makes no mention of DRS as a proven way to achieve this, despite studies showing it achieves a high reduction rate of marine litter.¹⁸⁰ As we will see in Chapter 4, this alliance is also pushing for weak and questionable legislation, with a significant emphasis on incineration, in the US.

2.3.3. Global Plastic Action Partnership



The Global Plastic Action Partnership (GPAP) is a public-private initiative founded in 2018 by the Canadian government (through Environment and Climate Change Canada) and the UK government (through the Department for the Environment, Food and Rural Affairs (DEFRA)). Corporate partners include Coca-Cola, PepsiCo, Japanese consumer-goods company Suntory, Nestlé and plastics producer Dow Chemicals. The initiative is hosted by the World Economic Forum.¹⁸¹

The UK government initially committed £2.4 million to GPAP – a contribution that, in March 2019, International Development Secretary Penny Mordaunt said would be doubled to £6 million.¹⁸² The Canadian government has committed \$6 million.¹⁸³ It is unclear how much member companies have invested.

GPAP describes itself as a 'multistakeholder platform dedicated to translating commitments to reduce plastic pollution and waste into concrete action.' Its stated goal is 'to drive the transition towards a circular plastics economy while helping to restore our natural systems and creating growth opportunities'.¹⁸⁴ However, as of 2020, only one of the partnership's three government agreements for pilot projects – Indonesia – has reported any detail. The action plan to reduce plastic waste in Indonesia focuses heavily on recycling without stipulating DRS for collection and – despite endorsement of the report from senior Indonesian government officials – shies away from any mandatory measures, even suggesting removal of problematic single-use items be achieved through 'voluntary industry action'.¹⁸⁵

2.3.4. Ellen MacArthur Foundation's New Plastics Economy Global Commitment



The EMF, founded in 2009, is a UK registered charity that aims to 'inspire a generation to re-think, re-design and build a positive future through the framework of a circular economy'.¹⁸⁶ In 2017, EMF launched the report *The New Plastics Economy: Rethinking the Future of Plastics* at the World Economic Forum in Davos. In October 2018, the New Plastics Economy Global Commitment was launched in collaboration with the UN Environment Programme (UNEP). More than 450 organisations signing up to 2025 targets related to addressing plastic waste at its source, including on eliminating certain plastics; ensuring all single-use plastics are recyclable, compostable or biodegradable; and including a percentage of recycled plastic content in packaging. Core partners of the New Plastics Economy initiative are major packaging, plastics and FMCG companies, such as Amcor, Borealis, Coca-Cola, Danone, L'Oreal, Mars, Nestlé, PepsiCo, Unilever, Veolia and Walmart.¹⁸⁷

Although the executive director of UNEP hailed the initiative as 'the most ambitious set of targets we have seen yet in the fight to beat plastics pollution',¹⁸⁸ this seems to be wishful thinking; there are critical shortcomings in the project, and its long-term impact remains questionable. It is worth noting that, prior to the Global Commitment, more than a decade of similar commitments had already passed, with many resulting in failures due to a lack of accountability.

In 2019, the first *Global Commitment Progress Report* was launched, 'providing an unprecedented level of transparency on how these signatories are reshaping the plastics system'.¹⁸⁹ Yet the foreword to the report suggests the main advance has been companies openly listing targets and establishing quantitative baselines on plastics use.¹⁹⁰ Furthermore, the signatories comprise over 200 businesses across all stages of the plastic-packaging value chain – but this still represents just 20% of all plastic packaging used globally, and some large multinationals (such as P&G) have not signed up.¹⁹¹ Many of the targets also align to what the companies may have been doing anyway, as part of their CSR efforts, in response to either the significant increase in public concern about marine plastic pollution or legislation such as the EU SUP Directive.

The New Plastics Economy initiative succeeded in getting 35 companies to finally disclose their total plastic footprint. It also has some other good elements, like inviting signatories to look at other problematic single-use items they produce and asking them to introduce the need to clean the circular-economy loop, phase out toxics at source and increase traceability. However, calling this disclosure 'un-

precedented transparency’ is somewhat far-fetched, considering this represents only 20% of signatories.¹⁹² The picture also remains a long way from complete; the companies are not compelled to publish all the data they share with the EMF, nor is the data independently verified.¹⁹³

Two key shortcomings of the New Plastics Economy are that companies’ voluntary commitments do not go far enough, and that they fundamentally lack accountability because there is no enforcement of consequences for companies failing to meet the targets. Companies are reluctant to make pledges regarding the collection and recovery of plastics, and notably few have made commitments to an absolute reduction in the volume of virgin plastic being produced and used.¹⁹⁴ The EMF appears to allow companies to sidestep their responsibility in this way, rather than pushing them to adopt comprehensive strategies for reducing single-use plastics. More concerningly – although supportive of the three companies that have set targets to reduce reliance on virgin plastic, and praises Unilever, Mars and PepsiCo for their voluntary commitments in this regard – the EMF seems unconcerned by the methods proposed to achieve these targets. For example, there are no questions raised about Mars’s strategy, which is heavily reliant on chemical recycling (as opposed to mechanical recycling), and it seems to allow chemical recycling to be considered as part of the circular economy.¹⁹⁵

When it comes to targets for reuse, the *New Plastics Economy Progress Report* shows that, while one-third of companies signed up to the initiative are piloting reuse systems, less than 3% of signatories’ packaging is actually reusable today.¹⁹⁶ This is inadequate; it is widely acknowledged that the plastic pollution crisis cannot be solved through more recycling, but rather requires a rethinking of business models to make reuse widespread. Furthermore, most companies that report being involved in systems for reuse highlight their partnership with TerraCycle’s Loop project, but this is currently only available through certain retailers in the US and Paris, with further expansion planned in 2020.¹⁹⁷ The pilot was also never designed to be larger than around 5,000 households per region, recognising that reverse logistics systems can have large carbon footprints when scaled up.¹⁹⁸ While Loop is a step in the right direction, there are additional questions around the affordability of such a system, and whether it is just an experiment in reuse for rich people rather than a revolutionary new way of consuming. Ironically, many of the companies calling for more businesses like Loop are the same ones that systematically dismantled localised reuse-distribution models, with the advent of the sachet economy, in countries like India and the Philippines.

The EMF is apparently well aware that the world cannot recycle its way out of the plastic problem. Sander Defruyt, project leader for the New Plastics Economy, said in a recent interview that solving the plastic-waste problem was ‘*not about keeping today’s system and increasing the recycling rate. It’s about fundamentally changing the system.*’¹⁹⁹ He also recognises that project members have shown ‘*an enormous lack of progress*’ on pioneering essential models for reuse.²⁰⁰ So far, however, the EMF does not appear to have a strategy to publicly hold individual members of the New Plastics Economy to account for a lack of ambition or transparency – it is, in essence, all carrot and no stick. Meanwhile, signatories blatantly use their participation in the programme for greenwashing purposes, and to boast to consumers and decision-makers about their (non-binding) commitment to a circular economy. Participants are, crucially, neither ranked by performance nor called out for lack thereof, nullifying any potential accountability or stimulus to improve.

Most FMCG companies involved in the New Plastics Economy have set specific targets to include variable percentages of post-consumer recycled content in their plastic packaging. With a couple of exceptions, they mostly aim to achieve 25% recycled content by 2025 – the goal set by the EMF.²⁰¹ Currently all companies are a long way off achieving these recycled-content targets. The top performer, Coca-Cola, only managed to achieve 10% recycled content in its plastic packaging last year; this is out of nearly 3 million tonnes of plastic – nearly all made from virgin plastic – used each year. At the bottom of the pile is Nestlé, with 2% recycled content out of 1.7 million tonnes of plastic packaging; Unilever is at less than 1%; and Mars is at 0%.²⁰²

Companies highlight that a big challenge to meeting recycled-content targets is the limited availability of high-quality recycled-waste materials.²⁰³ Instead of supporting legislation for mandatory collection and DRS that would help gain high-quality recycled plastic, however, most companies are focusing their efforts on partnerships with firms that are either developing chemical-recycling processes or investing in other problematic, immature technologies. Neither is the EMF calling for legislation or encouraging its signatories to align with the call for DRS and producer responsibility. Even worse, the EMF has publicly endorsed a report (the RP’s *Bridge to Circularity*)²⁰⁴ that is critical of deposit laws and EPR – despite the fact that these two policies have a proven track record of reaching higher recycling rates, as well as bringing companies higher-quality recycled materials to meet their recycled-content targets. This report was written to increase understanding of how brands can achieve their *global commitments* in the US, but instead of solutions that work, its recommendations stay firmly in the sphere of weak voluntary actions – consumer educations, piloting apps, and artificial intelligence in trucks and homes to monitor progress and material quality.

The overall problem with voluntary commitments and targets is that they are meaningless unless there is an effective way to enforce companies to comply with them. As we will see in the next chapter, the industry uses voluntary pledges as a tactic to successfully prevent effective regulation, only for the voluntary commitments to get broken further down the line. If major plastic-polluting companies wish to support initiatives like the New Plastics Economy, they must also call for and support ambitious legislation globally; for example, by supporting mandatory separate collection of plastic packaging at rates of 90% or above. This would also require cutting ties with alliances and industry groups that aim to weaken such regulations. Such actions would send a clear signal that companies are taking responsibility, and are committed to being part of a real solution to the plastic-waste crisis.



Part of the EMF New Plastics Economy, the Plastics Pact is a network of initiatives at a national or regional level that bring together governments, businesses and citizens to implement solutions towards a circular economy for plastics. The network includes the UK Plastic Pact, Dutch Plastic Pact, French Plastic Pact and European Plastic Pact – which we will focus on here – as well as a growing list of other regional pacts, such as those in Chile and South Africa.²⁰⁵

2.3.5.1. The UK Plastics Pact and Waste and Resources Action Programme (WRAP)

The UK’s Plastic Pact was launched in April 2018 by WRAP, the local UK coordinating organisation. It aims to achieve the following targets by 2025:²⁰⁶

- 100% of plastic packaging will be reusable, recyclable or compostable;
- 70% of plastic packaging will be effectively recycled or composted;
- average recycled content of 30% across all plastic packaging; and
- actions taken to eliminate problematic or unnecessary single-use packaging items through redesign, innovation or alternative (reuse) delivery models.

It is perhaps not surprising that WRAP is leading the UK Plastics Pact, since it has a history of initiating corporate voluntary initiatives on aspects of waste management. In 2010, DEFRA and WRAP commissioned a study evaluating waste ‘voluntary agreements’ from environmental consultants, Eunomia. While the report was expected to praise some voluntary agreements, it was also anticipated to raise concerns and suggest improvements.²⁰⁷ The report was due to be published alongside the UK Government’s Waste Review that same year. The Waste Review was published in June 2011, and heavily promoted the ongoing approach of DEFRA and WRAP; that is, working to reduce plastic waste through voluntary schemes, as part of a wider government agenda of deregulation for businesses.²⁰⁸ DEFRA minister, Lord Henley, said: ‘*This government believes that businesses ... should be encouraged to do the right thing, rather than be tied down or penalised with excessive rules and regulations ... We see responsibility deals [i.e. voluntary schemes] as an important part of the drive towards a zero-waste economy.*’²⁰⁹

The Eunomia report, however, was never published. DEFRA said the report helped inform the review, although ‘*the government made clear in the coalition agreement that it will promote voluntary rather than regulatory approaches whenever possible to avoid unnecessary bureaucracy and enable people to make better choices for themselves.*’²¹⁰

Although the content of the report was never published, an ENDS article highlighted that, of over 20 voluntary agreements signed between government and industry between 2001 and 2010, some have been outright failures and others – though signed with much fanfare – are not quite the panacea promised.²¹¹ The number of voluntary initiatives also tends to show an increase whenever new legislation is on the horizon. Indeed, the 2018 Plastics Pact came at a time when the UK government was considering requiring supermarkets to

pay more towards collection and recycling of the waste they produce.²¹² According to *The Guardian*, UK supermarkets pay less for plastic-waste collection and recycling than any other country in Europe, leaving taxpayers to cover 90% of the cost.²¹³

While promoters of the pact promised great ambition from its 127 signatories, a progress report from WRAP in 2019 (one year into the initiative) only provided updates on 45 of those companies – just 1 in 3. Of that small selection, only 1 in 5 had taken action on all 4 targets, and 16% had failed to move on even 1 target.²¹⁴ Responding to criticism, WRAP commented that it wanted to showcase the achievements of the signatories' activities. However, by launching a pact designed to push businesses forwards in their plastic-related targets – but not simultaneously calling out those whose motivation seems more focused on the free PR of joining the movement than on committing to progress – the pact undermines its ability to separate the leaders from the laggards, and highlights the structural flaws in voluntary initiatives with no assurance of enforcement.

2.3.5.2. Dutch Plastics Pact

PLASTIC
PACT NL

The Dutch Plastics Pact was established in February 2019 with 96 signatories. In a compliance report a year later, the Ministry of Infrastructure and Water Management overseeing the scheme noted that, of the 67 parties able to deliver data, 'as yet 40% have done so'. In addition, 'very little information regarding the reuse and sorting of plastic has been sent in. Similarly, little information has been received about the quantities of hazardous substances ... in plastic.'²¹⁵ Although some companies had 'practical reasons' for not having submitted data, the 60% non-compliance rate raises questions about the extent to which companies have genuinely bought into the Pact, rather than seeing it as merely a CSR exercise.

The Dutch Plastics Pact is a further example of governments being convinced that voluntary commitments not only work but are also on a par with legislation and mandatory measures. It also illustrates a trap such initiatives fall into – lowering the barrier to entry without accountability to even report data and progress towards the pact's objectives.

2.3.5.3. European Plastics Pact

EUROPEAN
PLASTIC
PACT

The European Plastics Pact was launched on 6 March 2020 and is open to all European Economic Area countries (including the UK). The initiative is led by the French, Dutch and Danish governments, in consultation with more than 80 organisations across Europe, with support from WRAP. Its 2025 targets include:

- Make all plastic packaging and single-use plastic products reusable where possible, and in all cases recyclable;
- Reduce the need for virgin-plastic products and packaging by at least 20%;
- Increase the collection, sorting and recycling capacity of all plastics used in packaging and single-use products in participating countries by at least 25%; and
- Boost the use of recycled plastics as much as possible, with an average of at least 30% recycled plastics across single-use plastic products and packaging.

Although the primary aim remains 'to close the loop and significantly increase recycling of plastics', the European Plastics Pact is considered more ambitious than other national pacts due to its overall plastic-reduction objectives.

However, the lack of civil society involvement was a concern, with NGOs only being engaged on the surface, leading major plastics campaign groups – such as Break Free From Plastic – to decline to sign the pact. Break Free From Plastic also emphasised that the initiative remains voluntary and cannot replace strong regulatory measures.²¹⁶

Although the pact aims to bring together actors from across the supply chain, virgin plastics producers are largely missing from the signatories, which is likely to hinder significant accomplishment. The EuPC (the plastics-manufacturing association) refused to join, noting it was already engaged in other initiatives, and the absence of major fossil-fuel companies (such as the Dutch company Shell) led Dutch

NGO, the Plastic Soup Foundation, to state: 'as long as companies like Shell are allowed to flood the world with new plastic unhindered and as long as mandatory measures are lacking, the European Plastic Pact, despite its good intentions, is nothing more than a sham.'²¹⁷



Plastic waste at a processing plant in the United Kingdom

Credit: David Mirzoeff

Box 2.1: Sticking-plaster solutions

Alongside the aforementioned major initiatives, we uncovered a glut of sticking-plaster solutions that do very little to tackle the issue of plastic pollution. Many are well-intentioned – if misguided – attempts to mop up the problem without turning off the tap, but industry co-option can steer these efforts into dangerous greenwashing territory.

Sea the Future

#NOPLASTICWASTE

Andrew Forrest, an Australian mining billionaire, has launched an initiative called Sea the Future that proposes manufacturers pay a voluntary financial contribution for producing plastic made from fossil fuels.²¹⁸ The idea is that this will make new fossil-fuel-based plastics more expensive to produce, and therefore promote reuse of the plastic that already exists. Targeted at 100 major plastic-resin producers for petrochemical companies, the voluntary contribution would start at \$200 per tonne and increase to \$5,000 per tonne for the most difficult-to-recycle plastics.²¹⁹

The main criticism of this idea is: Why would any company pay a voluntary financial contribution – or 'tax' – when they don't have to? Tellingly, no companies appear to have signed up to date.²²⁰

NaturALL Bottle Alliance



Nestlé, Danone and PepsiCo are all part of the NaturALL Bottle Alliance, an initiative working to make a 100% bio-based, recyclable beverage bottle from sustainable materials.²²¹ The launch of the Alliance was received with much self-congratulation and media coverage; however, it has neither committed to any timeframes (binding or otherwise) nor reported on its progress since 2018.²²²

Not only is bio-based plastic not the solution to the plastics crisis (see Box 4.5) but it may also create other environmental problems, notably by requiring land to grow feedstock, leading to pressure on natural ecosystems. Selling a bottle deemed 'eco-friendly' does, however, allow these brands to continue pushing single-use plastic, under the aegis that it's somehow inherently better for the environment because it is produced from 'renewable' plant materials.

The Ocean Clean-Up



Founded by young Dutch entrepreneur Boyan Slat, this project builds 'interceptors' – machines sitting in the mouths of rivers or dragged through the oceans to collect floating plastic waste. Much of the waste is returned to local collection systems, but a small amount is turned into novelty marine-plastic items. Although the project recognises that clean-up alone will not solve the crisis, its industry partners and supporters include Danone, petrochemical giant SABIC and industrial plastics manufacturer Agru – all of which are heavily invested in plastic production and likely to be using the project for greenwashing purposes.²²³

In addition to the project itself being highly flawed (the majority of ocean plastics below the surface are already fragmented), its positioning is also problematic; through popular platforms like TED and significant social media advertising, it has been portrayed as the solution to plastic pollution, siphoning away not only public attention from viable solutions and calls for regulation but also large amounts of funding.²²⁴

NextWave



With participating companies including Dell, General Motors, HP, Interface, IKEA, Bureo, Herman Miller, Humanscale, Trek Bicycles, General Motors and Solgaard, NextWave claims to be 'turning off the tap on plastic pollution by creating the first global network of ocean-bound plastics supply chains'. This will supposedly be achieved by creating a range of products made from marine plastics, including an HP laptop with 5% ocean plastic, HP ink cartridges, IKEA polyester fabric from fishing nets, Humanscale's 'ergonomic desk chair', a Bureo skateboard and Interface carpet tiles. While these products may help raise awareness of how much recyclable material ends up in the ocean, making new plastic products out of ocean plastic will not even approach turning off the tap on the plastics crisis, and does very little to stop the flow of plastics into the environment in the first place.²²⁵

2.4. Voluntary initiatives: All talk and no action?

We have seen how voluntary efforts from major plastic polluters consistently fail to meet the levels of ambition required to tackle the problem at source. Few companies call for mandatory collection of packaging globally, while progress on reuse and refill is very limited. Recycled-content targets are heading in the right direction, but creative accounting (using averages and low baselines) and communication of commitments or achievements specific only to some brands shows there is much work to be done. As we have seen, some companies regard these commitments as just paper promises anyway – easily warped, reframed or conveniently ignored – while their marketing departments always aim to generate positive press headlines on the latest progressive-sounding commitment. Likewise, consistent plastic policy across markets is missing from most FMCG commitments, with many only begrudgingly meeting requirements in regions where regulation is in place (such as the EU) while using larger amounts of plastic in their products sold in low- and middle-income countries.

Smart Ocean Chair made of ocean plastic sold at \$1099 |



Ultimately, voluntary industry initiatives are not the answer to the plastic-waste crisis. False solutions – such as replacing single-use plastics with other single-use materials, or promoting bio-based or compostable plastics – may cause unintended consequences and scale up other environmental problems. Often, companies appear to be looking for magical technical fixes instead of focusing on the solutions that have already been proven to work effectively, such as DRS for collection, because these solutions would require companies to fully step up their responsibility – and stump up the cost – to be part of a lasting answer.

Similarly, the raft of voluntary group initiatives that has sprung up in response to unprecedented awareness of the plastics crisis risks distracting attention from the efforts that will create real change, focusing instead on end-of-pipe solutions, unambitious targets and weak incentives. At best, by lending credibility to the worst polluters without accountability or enforcement, group alliances are helping to construct a smokescreen of sustainability, behind which plastic producers and consumer brands can continue to pump the world full of plastic unabated. At worst, these groups are being used to actively delay and undermine more transformative legislative action, which would compel plastic producers to collect what they put on the market, reduce plastic production in absolute terms, and introduce effective recycling and reuse systems, leading real transformation towards circular economy.

The barrier to entry seems startlingly low; in some cases, even the most basic requirements, such as reporting total plastic footprint, don't seem to be required of the major FMCGs – and, once a corporation is in, there is little to no external accountability. If the initiatives do not actively work to heighten ambition and separate the leaders from the laggards, the incentives are reduced to their lowest common denominator: greenwashing talking shops, paying flimsy lip service to change with no intention of breaking from business as usual.



Plastic pollution on the banks of a river |
Credit: Pxfuel |

Consumer-goods companies, retailers and plastic manufacturers promote their voluntary initiatives and ‘new’ solutions to appear to be doing their part to address the plastics crisis. Yet, at the same time that companies’ public marketing and communications convey a ‘green halo’ to consumers, their actions behind the scenes often tell a very different story. As we will see in the next chapter, when we look closer at industry responses to ambitious, meaningful and binding legislation – such as mandatory collection of plastics, bans on single-use plastics or eco-design measures – we see repeated examples of the very same companies and industry-backed trade associations attacking, undermining and delaying legislation that would achieve significant change.

Box 2.2: What does a good voluntary initiative look like?

While there is limited use for voluntary initiatives, if an initiative wishes to be transformational, here are some essential guidelines on how to achieve this:

- Adequately hold members accountable for their voluntary commitments, ensuring transparency of reporting on individual company baselines and progress, with independently verified data.
- Enforce the voluntary commitments and keep criteria for participation robust and ambitious, including by ranking companies on their performance.
- Ensure the level of ambition stays high by regularly updating targets and sharing best practices with members.
- Ensure member companies apply the same ambitious policies across all markets in which they operate.
- Ensure plastic is not replaced by other single-use materials, such as paper or compostable plastic.
- Question companies’ reliance on unproven or false technologies – such as chemical recycling – when setting their targets.
- Call for progressive legislation to reduce plastic pollution, including mandatory collection, such as DRS, around the world.
- If any company is found to be lobbying against progressive legislation or proposals, revoke that company’s membership. In addition, do not allow companies to be members of industry associations that lobby against legislation to address plastic pollution.

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