



## 5. Conclusion and recommendations

This report has exposed a raft of strategies and tactics companies in the plastics supply chain employ to obfuscate attempts to tackle the plastic pollution crisis. We have revealed how plastic producers and consumer brands have created a whole network of organisations to distract, delay and derail legislation, and presented case studies on how these tactics play out in different regions across the world.

We have also uncovered what lies behind the smokescreen of voluntary commitments and nice-sounding initiatives to address the issue. Although the industry has been under pressure to reduce single-use plastic, and to transition to a circular economy through reuse and effective recycling, these outcomes still represent less than 10% of what happens to plastic at the end of its life.

The rest ends up as pollution in our natural environment, is burned in toxic incinerators or is left to slowly rot in ever-growing landfills. The scourge of plastic pollution across the world is evidence enough to show the voluntary approach has failed. The tide of plastic pollution must be stemmed at its source - through effective legislation for absolute reduction in plastics, and through mandatory collection - so that those currently flooding the world with plastic are responsible for ensuring it no longer ends up in the environment.

## 5.1. Weak individual company commitments

Our research has revealed how voluntary commitments from major plastic polluters consistently fail to meet the levels of ambition required. Few companies call for mandatory collection of packaging globally, while progress on reuse and refill is very limited. Likewise, consistent plastic policy across markets is missing from most FMCG companies – indeed, many use even larger amounts of plastic in the products they sell in low- and middle-income countries. False solutions – such as replacing single-use plastics with other single-use materials, or promoting bio-based, biodegradable and compostable plastics – may cause unintended consequences and scale up other environmental problems in their wake.

Companies often appear keen to seek magical technical fixes (such as chemical recycling) instead of focusing on solutions that have already been proven to work effectively (such as DRS with refill and effective mechanical recycling). They fight these proven solutions tooth and nail because such solutions would require them to fully step up their responsibility and taking on the true costs of plastic pollution, which have been externalised onto the environment and the health of vulnerable communities for too long. The linear-economy business model of buy-use-dispose is always cheaper for these corporations because somebody else is footing the bill for the waste they create.

## 5.2. Misguided group initiatives

Similarly, we have analysed some of the most prominent group initiatives that have sprung up in response to unprecedented public awareness of the plastics crisis. In terms of content, most of these initiatives serve to distract attention from efforts that will create real, lasting change, focusing instead on products' recyclability or end-of-pipe solutions (such as clean-ups), which saddle the consumer with most of the blame – and public authorities with most of the cost – for a waste problem created by corporations. The barrier to entry for these initiatives is startlingly low; in some cases, even the most basic requirements (such as reporting total plastic footprint) seem not to be required of the major FMCGs, and, once a corporation is in, there is little to no external accountability. 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 complicit in actively delaying and undermining more transformative legislative action.

## 5.3. History of broken promises

Regardless of how ambitious voluntary commitments sound, we have revealed that many companies regard them as merely headline-generating paper promises – easily warped, reframed or ignored.

Our analysis of the commitments of Coca-Cola – the biggest plastic polluter – shows the company has broken, delayed or morphed most of their impressive-sounding commitments over the last 30 years. At the same time, it has fiercely opposed progressive legislation, from DRS to redesign obligations (such as tethered caps). Coca-Cola did this both by lobbying directly and by proxy through different industry associations, such as ABA in the US and UNESDA at the EU level. Only when they realised the battle was lost did they come out in favour of 'well-designed DRS', as we have seen in Scotland and, later, at the EU level. But we should not be fooled by this support; our investigation has revealed Coca-Cola continues to undermine DRS proposals in other regions, such as China's Hainan province and Kenya.

Coca-Cola is not the only company breaking its promises. Nestlé Waters N.A. and PepsiCo both broke their commitments to *As You Sow* to double recycling of PET plastic bottles to 60% by 2018, and to increase the US beverage-container recycling rate to 50% by 2018, respectively.

## 5.4. Corporate actions to stop legislation

As our case studies across the world have shown, large international corporations have the benefit of operating at numerous levels and participating in many different organisations and associations – some created to make them look like they are committed to helping, others to defend their interests from policy interventions. These corporations also have budgets that buy them influence and access to decision-makers – and leverage over consumers – through well-resourced campaigns, which seek to either demonstrate they are part of the solution or rehabilitate the sinking reputation of plastics as a foundation of modern life.

We have exposed the companies behind these attempts, which range from oil and chemical companies to major retailers, beverage producers, consumer brands and even waste-management companies. This report has revealed the incredible web of influence these corporations have, and how quickly and fiercely they react to even the smallest attempt by legislators to restrict or regulate plastic. They mobilise in full force against local grassroots initiatives to ban plastic bags (as we have seen in the US) or plastic bottles (as we have seen in La Paz, Bolivia). Their efforts to derail legislation range from early attempts to distract and delay (by not providing reliable data on plastic footprints and recycling rates, which would enable meaningful decision-making) to legal challenges to legislation, and even pre-emptive laws to nip future regulation in the bud.

## 5.5. Pushing responsibility for waste and recycling onto consumers

One of the key tactics in this playbook of false solutions has been to point the finger of blame firmly at consumers. It's not plastic that's the problem – it's the 'litterbugs' who do not properly dispose of their waste. The industry cooked up this strategy in the 1950s, and has become more and more sophisticated as NGOs and investigative journalists have started to expose its tricks. The industry invests enormous amounts of effort and money into convincing consumers the plastic problem could be solved through recycling alone. However, the evidence shows that many of these companies' products and packaging are impossible to recycle, or cannot be recycled at scale. Instead of switching to other materials and business models, the industry has disseminated campaigns to 'educate consumers' about where and how they should recycle their non-recyclable waste, and invested in new problematic technologies such as chemical recycling.

Industry tactics for placing the blame elsewhere have also become increasingly elaborate. Instead of taking responsibility for the waste it creates, the industry now blames low- and middle-income countries – especially in Asia – for ocean plastics, due to their 'lack of waste-management infrastructure'. In doing this, they are conveniently forgetting that most ocean plastic pollution consists of the products these corporations sell there, and that many of these countries also face the double burden of being the dumping ground for the world's exported waste.

## 5.6. Exploiting the crisis

The Covid-19 health crisis has, once again, shown that Big Plastic is always primed and ready to co-opt a crisis to their advantage, pushing to undermine environmental legislation or any restrictions on their products. As the tide has turned in attitudes towards (single-use) plastics – from local grassroots action to the adoption of progressive legislation in Europe and China's decision to stop accepting the world's waste – the plastics industry was quick to spot an opportunity in the pandemic, both to roll back some of this legislation (notably plastic-bag bans) and to position all plastic (not just PPE) as vital to sanitation, conveniently ignoring the wide-ranging deleterious effects to human health caused by every stage of the plastics life cycle.



This report shows that the plastics industry does not have people's best interests at heart; instead, it is making cold calculations to carry on with business as usual. Meanwhile, ever-increasing production of plastic threatens to overwhelm our remaining carbon budget, with emissions generated at each juncture of extraction, production, use and disposal. A robust, mandatory and timely response to plastic pollution is critical to maintaining the health of our planet and people.

Plastic pollution is unprecedentedly problematic, and its instigators have evaded real accountability for too long. This report shows we need urgent and radical legislative action to bring this crisis under control. The following recommendations suggest how to start this process.

## 5.7. Recommendations

### 5.7.1. For policymakers

This report has shown that voluntary initiatives and commitments by the industry do not work. For this reason, policymakers should adopt progressive legislation, built on the following key elements:

#### Separate collection

- Introduce legislation mandating at least 90% separate collection of plastic waste (while systems for plastic bottles and other beverage containers are already well established, this should go beyond beverage containers to look at other types of packaging), and acknowledge that mandatory deposit return systems are the only proven and effective way to achieve high levels of collection and litter reduction.

#### Reuse policy

- Introduce reuse targets and other supportive policy mechanisms (such as differentiated deposits for refillables), built into policies from the outset - and, in doing so, acknowledge that plastics and other materials cannot be reused at a significant scale without at least 90% mandatory collection and deposit return systems.

#### Recycled content

- Implement minimum recycled-content targets in the production of packaging and containers of at least 50% for beverage containers and at least 30% for other items, as a starting point. This creates a market for effective plastic recycling, and maintains plastic in a closed loop without downcycling the material.
- Address the issue of hazardous chemicals, and ensure companies design products from the start that can be recycled in a healthy closed loop. For example, at the EU level, end exemptions for chemicals in recycled materials and regulate chemical groups (rather than individual chemicals) to avoid regrettable substitution.

#### Virgin-plastic tax

- Introduce a tax on virgin plastic, which must ensure the use of recycled plastic is incentivised over virgin plastic. This should be accompanied with a clear position on the use of alternative materials, such as bio-based, biodegradable and compostable plastic, with justifications for what is - and what is not - a good use of these materials.

#### Ban harmful materials and chemicals

- Introduce bans on unnecessary or harmful plastic materials, such as PVC and polystyrene, and on single-use products that frequently end up as litter in the environment and ocean.
- Ban toxic chemicals across all products, and in recycled materials as well as in virgin materials.
- Prioritise reusable alternatives and act to avoid regrettable substitutions - for example, replacing single-use plastic with other single-use materials, such as bio-based, biodegradable or compostable plastic - which do not fix pollution problems and may also lead to other environmental problems.

#### Extended producer responsibility

- Introduce well-designed Extended Producer Responsibility schemes with modulated fees, the polluter-pays principle and reduction targets, and include funding for better alternatives to single-use.
- This report has also shown, however, that many PROs in the EU (ARA in Austria, Ecoembes in Spain, etc.) are being abused to lobby against progressive legislation, defending the interests of plastic producers and large retailers. If this is the case, governments should pass the necessary reforms to address it.

#### Zero Waste Cities

- Support the Zero Waste Cities approach by creating and implementing systems that continuously intend to phase out waste - not by incinerating, landfilling or exporting it, but instead by not generating waste in the first place.

#### Global action

- Establish an intergovernmental negotiating committee at the United Nations Environment Assembly to negotiate a dedicated global agreement - a Convention on Plastic Pollution - that eliminates plastic discharges into the environment while also promoting a safe circular economy for plastics; one that addresses the full life cycle of plastics, from production and design to prevention and waste management.

#### Include affected communities

- When legislation is developed in countries with informal waste-collection sectors, it is important that it is context-specific and actively includes waste-picker communities in its development.

### 5.7.2. For companies

#### Support legislation

- Ensure commitments are more ambitious than existing, or proposed, legislation to address plastic pollution.
- Openly express support of - and call for - progressive legislation to address the plastic crisis, encourage peers to do the same and leave any industry initiatives that oppose, delay or undermine progressive legislation - including its implementation.

#### Transparency

- Be transparent about the company's full plastic footprint (including products and packaging) and progress against targets on plastic, setting out a holistic approach to discourage 'virtue signalling' with tokenistic gestures (e.g. products from ocean plastic).
- Ensure reporting includes achievements across all markets and brands, and is based on independently verified data.

#### Reduction

- Commit to meaningful measures that would lead to a significant reduction in single-use plastics and other single-use materials. These measures need to be specific, measurable, time-bound and independently verified, and should include support for reuse, redesign of products and effective recycling.
- Ensure transparency in reporting progress on the number of units.



| Refill at the 'Harm Less Store' in Hornsey, UK

| Credit: David Mirzoeff

#### Clarity on alternative materials

- Outline clear positions on the use of alternative materials, such as bio-based, bio-degradable and compostable plastic, with justifications for what is - and isn't - a good use of these materials, including clear sustainability criteria that prevent deforestation or competition with food.
- Ensure such products are only commercialised in markets with the appropriate waste-management infrastructure to deal with them.

#### Consistency across markets

- Ensure commitments are enacted consistently across all markets in which the company (and its subsidiaries) operates; that is, ensure there is no contradiction between how a company acts on the issue of plastic pollution in one market compared to how it acts in another.

#### Robust voluntary commitments

- Ensure any voluntary initiative the company is part of adheres to the guidelines in Box 2.2 (Chapter 2) on what a good voluntary initiative looks like.

### 5.7.3. For consumers

It is not easy to solve this problem as a consumer. Because companies keep control over their packaging, they make it incredibly difficult to opt for plastic-free solutions or business models. An important step towards identifying where true accountability lies is recognising that, to a certain extent, we can only act as sustainably as the system allows us to. We firmly believe reducing plastics shouldn't be solely the consumer's responsibility, but rather part of a systemic change that is led by legislators and implemented by corporations. For this reason, we encourage individuals to be vocal in calling for legislation, holding corporations accountable, and amplifying the voices of those pushing for change.

We hope this report will help people to call out corporate hypocrisy where they see it, and to recognise when companies are trying to delay, distract and derail progress to remedy the crisis. Individual actions do help to send a signal - to both corporations and governments - that there is an appetite and an urgent need for change. So, if you do want to make changes as an individual, here are some recommendations on how to reduce your plastic footprint: <https://www.breakfreefromplastic.org/campaigns/goingforzerowaste/>