



## 4.5. Spain: A wolf in sheep's clothing

Spain is the fifth most populous country in the EU and the fourth-largest consumer of plastic containers, as well as producing 4.6 million tonnes of plastic in 2016.<sup>1</sup> Spain accounts for 10% of all single-use plastics consumed in Europe, including 3.5 billion soda bottles, 1.5 billion disposable cups of coffee, 50 billion cigarette butts, 5 billion plastic straws and 207 million disposable packaging units per year.<sup>2</sup>

Spain is one of the world's top plastic polluters, and has one of the highest rates of plastic generation per person: 0.28 kg daily. Spain dumps more plastic into the Mediterranean Sea - the sixth-largest area of plastic accumulation in the world - than any other country in the region except Turkey.<sup>3</sup>

Despite all this, on the surface it would appear that Spain leads the way in plastic recycling in Europe. In the EU, an estimated 42% of plastic-packaging waste was recycled in 2017, according to Eurostat; Spain, meanwhile, recycled 48% of its plastic-packaging waste.<sup>4</sup> However, several organisations have questioned this data; for example, Greenpeace states that the real figure is closer to 25% or lower, partly because much of the information provided to the Spanish government originates from the plastics industry itself.<sup>5</sup>



Plastic pollution on a beach in Spain

Credit: Fabien Montell / Shutterstock

The Spanish plastics industry is accused of not only hiding the real extent of the plastic-recycling crisis in Spain but also preventing, and lobbying against, the introduction of measures that would effectively address the problem. Companies in the plastics supply chain leverage an incredible range of tactics to stave off legislation that threatens business as usual.

### 4.5.1. Spain's plastics data is trash

Currently there are no reliable figures on the generation and treatment of plastic waste (including plastic packaging) in Spain. It is important to note that the approximate data available varies considerably, and comes mainly from three different sources.

First, the Spanish government - through the Ministry for Ecological Transition - supplies information to the EU. It has been criticised for providing figures that contain statistical limitations and do not provide a full picture of how the waste of single-use plastic containers is being managed.<sup>6</sup> This data has also been questioned by several organisations, which claim the real figure is lower than that provided - partly because much of the information provided to the Spanish government originates from the plastics industry itself, which has a vested interest in obfuscating the data to conceal the need for change.<sup>7</sup>

The second source - also accused of publishing false figures due to the absence of methodological descriptions or statistical breakdowns - is Ecoembes (Ecoembalajes España, SA). Ecoembes is a non-profit PRO responsible for managing plastic recycling in Spain.<sup>8</sup> According to Ecoembes, 69.7% of disposable plastic containers were recycled in 2017<sup>9</sup> - almost three times the figure provided by Greenpeace that year (25.4%). Ecoembes added that 75.8% of disposable plastic containers were recycled in 2018<sup>10</sup> not only an improvement on the previous year but also three times the target set out by the EU (22.5%).<sup>11</sup> Prominent environmental organisations in Spain (such as Greenpeace, Ecologistas en Acción and Friends of the Earth) have accused Ecoembes of manipulating data to create the impression that Spain is on track to achieve EU targets.<sup>12</sup> The data Ecoembes generates is extremely influential, since this organisation manages most of the waste in Spain.



The third set of data is presented by environmental organisations - such as Ecologistas en Acción, Friends of the Earth and Greenpeace - that conduct their own calculations, based on official government figures (at municipal and regional levels), and combine those with data obtained on the ground across the plastic-waste-treatment

system. According to Greenpeace (2019), Spain lags behind most European countries in terms of plastic recycling - only around 25% of plastic waste is recycled,<sup>13</sup> 790,000 tonnes of plastic end up in landfills and 170,000 tonnes are incinerated. Crucially, just over 318,926 tonnes were exported to other countries in 2016 - a statistical grey area, which is often counted towards the overall recycling rate, despite the fact that exported plastic is rarely recycled by the importing country.<sup>14</sup>

**Table 4.2:** Reported recycling rates of plastic containers in Spain

Year	Reporting organisation			
	Ecoembes	Eurostat <sup>15</sup>	Cicloplast <sup>16</sup>	Greenpeace <sup>17</sup>
2016	66.5%	45.5%	45.4%	-
2017	69.7%	48%	48%	25.4%
2018	75.8%	-	-	-

**Notes**

(i) The numbers provided by Ecoembes account for all packaging collected, regardless of material and form of collection.

(ii) The data provided by Greenpeace is an approximate calculation of plastic containers recycled.

Given this dissonance in the data - and given the industry has been accused of covering up the real extent of Spain's plastic pollution and recycling gaps - it is almost impossible to know the actual figures.<sup>18</sup> Neither are there any official figures on the kind of plastic packages recovered, littering of plastic packages, the amount of plastic packages companies put on the market, nor the amount of plastic packages that go to landfill sites - only the total plastic-waste figure is provided.

#### 4.5.2. The tentacles of Ecoembes

Ecoembes is the PRO responsible for managing the funds raised from the fees packaging companies pay to recycle plastic. It is controlled by the company Ecoembalajes España SA - a powerful business network comprising more than 12,000 companies linked to the plastics industry - which holds 60% of the shares. Ecoembes' oversight includes all materials for containers and packaging; however, it acts as the main lobbying group for the plastics industry in Spain.<sup>19</sup>

The most prominent consumer brand members of Ecoembes are Bimbo, Pascual, Campofrío, Coca-Cola, Colgate, Danone, Henkel, L'Oréal, Nestlé and PepsiCo. Among its plastic-packaging members are Tetra Pak Hispania, Cicloplast and Ecoacero. Finally, its membership includes large retailers, such as Alcampo, Carrefour, DIA, El Corte Inglés, Mercadona and SPAR. The board of Ecoembes is not only controlled by these same companies but also operates through a proxy organisation; as a result, consumer-goods companies and retailers can avoid directly staining their hands with lobbying. It is also worth noting that Ecoembes' top executives earn more than double the President of the Government of Spain, despite Ecoembes being a non-profit organisation.<sup>20</sup>

In Spain, the Packaging Law allows a choice between EPR or DRS. However, since its inception in 1996, Ecoembes has repeatedly rejected DRS under the premises that it would be too costly for the industry and that recycling rates of plastic packages in Spain are already very high - above EU targets, according to its own, highly questionable data.

#### 4.5.2.1. Ecoembes: The art of manipulation

*They have a lot of money and what they do is spend everything on communications. It is very difficult to stand up to them because they have bought almost all the media outlets. There are people who dare to denounce the lies of Ecoembes, but they don't go far because Ecoembes invests so much money in the media that everything ends up being buried.*

- Juantxo López de Uralde, Spanish politician and former director of Greenpeace Spain

Ecoembes uses communications as a key influencing tool, disseminating its messages through digital and printed media, sponsored content and advertising in the main national and regional broadcasters and TV stations in the country. All this translates into a wide reach and influence in the Spanish press, and an ability to denounce any claims or accusations made against it.

For example, in 2019, Greenpeace published a report questioning Ecoembes's data on the recycling of plastic waste and packaging in Spain, and debunking the alleged collection success of its current EPR model.<sup>21</sup> Just hours after Greenpeace launched the report, several national and regional media outlets publicised Ecoembes's response, which accused the environmental organisation of being 'irresponsible' and creating mere 'lies' - although without any specific refutation of Greenpeace's research, nor any evidence to the contrary.<sup>22</sup>

Other advertising campaigns raise concerns about Ecoembes's greenwashing.<sup>23</sup> This includes using the image of environmental activists like Greta Thunberg in announcements and documents, and the publication of manipulated images. For example, in Ecoembes's TV ad, #ReciclaYRespira ('recycle and breathe'),<sup>24</sup> the company uses an image supposedly of a polluted street in Spain; however, it was discovered that the photo depicted a road in Beijing with the road signs photoshopped.<sup>25</sup> Additionally, Ecoembes finances and is a main sponsor of the National Congress on the Environment and the Journalists Association for Environmental Information - and was even a large sponsor of the UN Climate Change Conference, COP25 Madrid, in 2019.<sup>26</sup>

**Figure 4.4:** Ecoembes: The power of manipulation<sup>27</sup>



#### 4.5.2.2. Controlling the narrative

Another way in which Ecoembes manipulates Spain's narrative around plastic waste is through sponsoring scientific studies from prestigious Spanish public and private universities. Ecoembes directly sponsors the Environmental Chair at the Polytechnic University of Madrid<sup>28</sup> - the only department in that institution that investigates plastic-packaging waste.<sup>29</sup> The Polytechnic University of Madrid, the University of Alicante and the University of Alcalá de Henares have also accepted similar funding from Ecoembes.

Through its sponsorship, it appears Ecoembes has exercised undue influence on the academic rigour of these institutions' reports on plastic waste - reports that have been criticised for misinforming the public about real recycling rates, providing misleading information about the options for improving the current system and disclosing neither methodological details nor how certain calculations were reached. For example, the ARIADNA study - led by the ESCI-UPF School of International Studies - analysed the environmental, economic and social sustainability of the implementation of a mandatory DRS in Spain, alongside the current EPR system.<sup>30</sup> The study concluded the addition of a DRS would be less sustainable than continuing with the current system, and that any resources should be used to improve the existing system. However, the study was wholly funded by the industry associations behind the current EPR system in Spain, as well as Ecoembes.<sup>31</sup> A study by ENT Environment and Management Consultancy examined the ARIADNA study results and methodology, and concluded that the latter created unfounded assumptions about a DRS system in Spain, and was devised to satisfy the needs of the industry rather than to effectively consolidate a DRS in the country.<sup>32</sup>

The scientific rigour of another academic study - conducted by the Polytechnic University of Madrid and the University of Alcalá de Henares - was also called into question, since it was funded by the Plataforma Envases y Sociedad (an NGO under Ecoembes's control) and some of Spain's main plastics-industry organisations (the National Spanish Association of PET Packaging and the Spanish Association of the Plastics Industry). The comparative report, *Models of Household Packaging Management*, advised against implementing DRS in Spain and claimed it would be financially unfeasible, due to high rental costs for supermarkets to install RVMs.<sup>33</sup> The version of the study released to the public not only fails to fully disclose its methodology but also based its considerations on luxury and prime retailing rental spaces, using some of Madrid's most exclusive zones - which are more expensive than the national average - as an average.<sup>34,35</sup>

While Ecoembes has previously spent large sums financing studies to attack DRS, its latest tactic to control the narrative has been to pilot a new voluntary DRS programme called RECICLOS.<sup>36</sup> With a limited number of RVMs installed in four municipalities of Catalonia, and a plan to introduce RECICLOS in five other autonomous communities of Spain,<sup>37</sup> the programme rewards citizens' environmental behaviour when returning their cans or plastic bottles by offering credit through a digital platform, which can be redeemed in certain shops or as donations to NGOs. This tactic attempts to prove that voluntary measures can achieve high collection rates - but is strikingly ironic, given Ecoembes's persistence in undermining DRS.

#### 4.5.3. Supermarkets: Too little action, too much lobbying

Whereas consumer brands with strong brand equity face direct reputational damage when their products are found as litter, supermarkets are one step removed from this risk. Spanish supermarket chains are major contributors to plastic pollution, but are blamed to a far lesser extent.<sup>38</sup> However, a recent report revealed that Spanish supermarkets' commitments to tackle plastic pollution and eliminate single-use plastics are very limited. Most of the commitments use lightweighting as a mechanism to reduce their plastic by weight - with the notable exceptions of Mercadona and Dia - as well as swapping to biodegradable single-use packaging.<sup>39</sup>

Supermarkets claim reducing plastics in their establishments is too costly and time-consuming, and instead blame suppliers and consumers for a lack of demand for plastic-free products.<sup>40</sup> While redirecting blame, these retailers have also become the main opposition to introducing legislation to tackle plastic pollution. Such is the case for Mercadona and Carrefour, which lobby and pressure politicians to prevent the implementation of DRS, mainly through Ecoembes.<sup>41, 42</sup>

Mercadona and Carrefour also threaten other companies in Ecoembes that are more amenable to such legislation, including Coca-Cola, PepsiCo and Danone. According to our sources, tensions have escalated, with Mercadona threatening to remove dissenting companies'

products from their shelves if they come out publicly in favour of DRS. While fighting DRS, Mercadona has introduced a new target to increase recycled content - as part of its strategy to reduce the consumption of plastics - by 25% by 2025.<sup>43</sup> It is worth noting that, of the consumer brands supportive of DRS, many state the need for reliable sources of recycled content as their motivation, so it is unclear how Mercadona will reach its target without DRS.

#### 4.5.4. Same tactics, different regions

With waste management a devolved issue in Spain, some autonomous regions have tried taking steps towards better environmental legislation, and have proposed implementing DRS systems in their territories - but these efforts have been quickly undermined by the industry through Ecoembes and by big retailers. Only Navarra and the Balearic Islands managed to partly stand up to the powerful industry lobby, but most DRS initiatives have failed. In Valencia, Navarra and Catalonia, a combination of industry groups' tactics have transpired to delay or derail the establishment of DRS.

Mercadona - one of the biggest opponents of DRS |

Credit: Wikimedia |



##### 4.5.4.1. Navarra: Mixed progress

On 7 June 2018, the parliament of Navarra passed a new law on recycling, which aimed to encourage waste reduction and promote recycling by discouraging incineration and landfilling. Through the establishment of a legal framework to tax both practices, the law also proposed the creation of a DRS.<sup>44</sup>

From the start, Ecoembes opposed and quickly undermined the reforms under this law, as well as the introduction of a DRS system. Massive pressure also came from companies like Eroski, Coca-Cola, Ecovidrio and the water industry. Regardless of industry claims that the reforms would pose a risk to the current system, the Waste Plan and the law were passed following a process of public consultation.<sup>45</sup>

The new law set out DRS pilot projects for a period of two years, followed by a presentation of the results. These projects included establishing RVMs in parks in the summer of 2018.<sup>46</sup> However, due to high levels of industry pressure, the initial articles of the law proposing a complementary DRS were amended. Four amendments were incorporated, including an obligation to consult various stakeholders when approving any initiatives, which was seen as a covert way of delaying the process.

Ultimately, an appeal to the Council of Ministers was presented. This resulted in the repeal of the Waste Law in March 2019, based on the unconstitutionality of certain paragraphs that contravened state regulations, specifically those focused on the reduction of plastic bags and creation of a producer registry.<sup>47</sup> The appeal is currently being analysed by the Constitutional Court, which can take up to three years to determine its verdict. Fortunately, in this particular case, the law remains in place.

In the meantime - according to former Navarra Director General of the Environment, Eva Garcia Balaguer - industry has renewed pressure against the reform and the implementation of DRS, pushing to delay the deadline for banning single-use plastics in the region to 2021.<sup>48</sup>

#### 4.5.4.2. Valencia: Pressure to dismiss and fire opposition

*It appears that the entire business sector [the large packaging companies and their associated companies] has moved against DRS since it involves certain changes to the conditions in the market in which they compete.<sup>49</sup>*

- Julià Álvaro, former regional secretary of Environment and Climate Change of the Valencian Autonomous Community

*We have no doubt that the cessation of Julià Alvaro is a response to pressures against the policies that were carried out and is the culmination of industry's months of obstruction and obstacles to environmental policies.*

- López de Uralde, former Equos political party's spokesperson

In April 2016, the Valencian government announced its intention to implement a mandatory 10-cent refundable deposit on the purchase of all water, beer, soda and juice containers in 2017. In October 2016, the region made DRS a priority, drafting a law on Additional Environmental Protection and applying DRS to plastic, metal, Tetra Pak and glass containers of beers, juices, soft drinks and water.<sup>50</sup> However, by mid-2017 growing opposition from the plastics industry, Ecoembes and the Confederation of Tourist Entrepreneurs of the Valencian Community (CET-CV), as well as divisions in the government, led to the abandonment of the idea of DRS. Lobbying letters to the government reveal that Ecoembes even offered €17 million per year, or additional funding, subject to the proposed legislation being dropped.<sup>51</sup>

The industry's tactics in this particular case led to the dismissal of Julià Álvaro - regional secretary of Environment and Climate Change of the Valencian Autonomous Community, and a great defender of DRS.<sup>52</sup> With Ecoembes leading the way, the big drink brands and large supermarkets - Mercadona, Consum, MásyMás - systematically attacked and discredited Álvaro's work through the media, and put pressure on the Generalitat (state government) to act.<sup>53</sup> Mercadona, in particular, directly lobbied politicians to prevent the implementation of DRS in the region.<sup>54</sup> also continued to publicly push the claims that DRS would affect business costs and reduce shelving space in supermarkets. Pressure was also exerted via industry and trade associations, which continually raised this issue during meetings with the regional government.

CET-CV also openly lobbied against DRS, which it said would complicate hotel management, represent a clear risk of food cross-contamination and cause logistical problems, including the problem of finding space for RVMs.<sup>55</sup>

In the end, the combined efforts of Mercadona and overall industry pressure undermined the introduction of DRS and prompted the dismissal of Mr Álvaro.

#### 4.5.4.3. Catalonia: Silenced by the industry lobby

Discussions around the introduction of DRS in Catalonia started in 2013, following a successful pilot project in the Cadaques municipality,<sup>56</sup> but fierce industry opposition has largely derailed these efforts.

With the intention of implementing a DRS for single-use beverage containers in the whole region, the Catalan Waste Agency commissioned a technical, environmental and economic viability study. Even though the industry pressured the Catalan government not to carry out this study in the first place, the report was finally published in July 2017, and was presented to Catalonia's Secretary of the Environment and Sustainability.<sup>57</sup> The industry lobby - led by the president of DAMM (a beer manufacturer) and representatives from Ecoembes, Ecovidrio, Foment del Treball, Freixenet and others - orchestrated an in-person intervention a day before the Catalan minister in charge of the study, Santi Vila, was supposed to give it the green light.

As a result, the industry managed to delay the report's launch for over a year - although the study was, subsequently, published. After its release, the industry continued to denounce the report for underestimating the real costs of DRS and the effects it would have on businesses, especially small businesses.<sup>58</sup> Among the loudest opponents were Foment del Treball (a federation of entrepreneurs and Catalan industry),<sup>59</sup> the Spanish Association of Supermarket Chains (whose members include Alcampo, Carrefour, Eroski, Lidl, Mercadona and SuperCor)<sup>60</sup> and the Spanish Commerce Confederation.<sup>61</sup> Ecoembes also used its resources to attack the report through the aforementioned study by ESCI-UPF School of International Studies - funded by companies including Ecovidrio and Tetra Pak - and in a press release disputing the environmental benefits of DRS.<sup>62,63</sup>

Despite the extent to which the industry lobbied to discredit it, the study concluded that, with an appropriate system in place, a DRS would result in higher recycling rates for beverage containers; an overall annual 90% reduction in litter; and a reduction in clean-up costs, saving municipalities €16.90 million annually.<sup>64</sup> Despite the clear benefits confirmed by the study, the industry has still managed to delay its implementation.

#### 4.5.5. Fighting to the end

The example of Spain shows how a wide array of industry tactics have successfully undermined attempts to introduce DRS, or any other meaningful reform, at both national and regional levels.

The plastics lobby (led by Ecoembes and major supermarket giants, like Mercadona and Carrefour) continues to exert pressure - even threatening other companies - and is thus far succeeding in undermining attempts to tackle plastic pollution in Spain.

In June 2020, the Spanish government approved a tax on single-use plastic packaging for the manufacture, import or intra-community acquisition of containers to be used in the Spanish market.<sup>65</sup> This tax, which will come into force on 1 July 2021, will raise €724 million annually. While this new law sets a target of reducing waste generation by 15% by 2030 (compared to 2010 levels),<sup>66</sup> sooner or later Spain will have to comply with the EU SUP Directive, which stipulates that 77% of beverage bottles introduced into the market should be separately collected by 2025 and 90% collection should be reached by 2029 - for which the only proven method is DRS. Leaving DRS as a voluntary commitment for producers and retailers to implement on their own, rather than part of mandatory legislation, would be to cave to industry lobbying, yet again allowing the industry to evade its responsibility for plastic pollution.

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