

Summary



The hard truth about soft plastic

How supermarket soft plastic take-back schemes are misleading customers

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In 2021,¹ major UK supermarkets² started to introduce an initiative to tackle their growing plastic packaging footprint³ – front-of-store collection points to recycle soft plastic packaging (or take-back schemes).

A number of issues with these schemes have been flagged since their introduction, so Everyday Plastic and the Environmental Investigation Agency (EIA) decided to investigate further.

In July 2023 and February 2024, a total of 40 tracking devices (Apple AirTags) were distributed evenly across England by Everyday Plastic volunteers. These tracking devices were carefully packaged within bundles of soft plastic bags and wrappers⁴ and dropped at the front-of-store collection points at Sainsbury's and Tesco stores. This investigation aimed to understand the extent to which soft plastic packaging can be recycled, and is being recycled by Sainsbury's and Tesco, particularly within the UK.



Front-of-store collection points for soft plastic recycling at Tesco and Sainsbury's supermarkets

Customers are being misled

Soft plastic take-back schemes are presented to citizens as a solution to the continued and increased use of soft plastic packaging. The success of these take-back schemes relies on the goodwill of customers, who perceive recycling as a positive, planet-friendly action i.e., collecting soft plastic packaging waste at home to return it to a store. The schemes lack transparency regarding the developmental nature of the process, the market, and what happens to the soft plastic packaging waste collected through the schemes.

An accompanying legal briefing published by the environmental law NGO ClientEarth argues that supermarkets are misleading consumers about the environmental impact of soft plastic packaging, in breach of consumer protection law.

Take-back schemes may be obstructing genuine solutions

The truth is that finding a genuine solution for recycling soft plastic at scale is extremely difficult, if not impossible.

Research has shown that people can produce more waste when they think it will be recycled.⁵ It is not the intention to discredit recycling as a general waste management solution. However, we believe there is value in providing the truth about how difficult soft plastic packaging is to recycle in a closed-loop, and to therefore be truly circular.

We argue that the take-back schemes have the potential to undermine the change required for a shift towards the upper tiers of the waste hierarchy such as removal, reduction and reuse. We argue that there's a difference between finding a solution for unavoidable soft plastic packaging and increasing the use of this waste material based on a hypothetical, and problematic, future recycling solution.

The findings from our tracker investigation indicate just how hard it is to recycle post-consumer soft plastic packaging in the UK.

Sainsbury's and Tesco state that customers can return their soft plastic to store for recycling, therefore inferring that it will be recycled.

However, of the trackers whose final destination we were able to ascertain, our results show that:

- **None of the soft plastics bundles placed in front-of-store collection points were closed-loop recycled.**
- **70% of the soft plastic that reached a known final waste facility destination was burnt⁶, not recycled.⁷**
- **The rest ended up at recycling facilities that downcycle soft plastic waste into lower value products (such as bin bags, carrier bags and composite timber boards) – 80% of which were sent to recycling facilities abroad, the majority to Türkiye.**



The outcomes of the investigation have revealed that a small group of waste companies are responsible for managing collected soft plastic packaging waste once it has left Sainsbury's and Tesco supermarkets. But where it subsequently ends up appears to be unsystematic – with notable differences in final outcomes between the tracked bundles of soft plastic dropped at Sainsbury's and those at Tesco.

**Figure 1:
Outcomes of trackers that reached a final destination**



Supermarkets are not doing enough to lead game-changing initiatives to significantly eliminate packaging

Despite supermarkets' justification for the need for plastic packaging, studies have shown that the elimination of certain plastic packaging on products does not negatively impact shelf life and would result in significant reduction of soft plastic packaging use. However, voluntary industry commitments are not going fast enough or far enough to tackle the scale of the challenge. **Targets will likely be missed and delayed, all while data shows an increased level of soft plastic packaging on UK shelves.** Instead of placing

an even greater focus on removing non-essential single-use plastic packaging or rolling out reuse and refill at scale, supermarkets are continuing to use – and most likely increasing their use of – lightweight, soft plastic packaging.

Sainsbury's and Tesco are claiming to recycle soft plastic packaging which is contributing to achieving their recyclability targets. New policy and legislation could level the playing field and drive greater collaboration; however, supermarkets are not pushing hard enough for government intervention.

Recycling claims have come to misrepresent what is a limited and incomplete fix for the environmental impact of plastic packaging

Soft plastic is acknowledged by the waste management industry and the UK government as incredibly challenging to recycle.

But even if the material is theoretically recyclable:

- UK infrastructure only has the capacity to recycle just over one-quarter of soft plastic placed on the market. It is important to note that only a small amount of this capacity will likely be allocated for post-consumer plastic film (i.e. soft plastic packaging).
- The UK is currently limited to commercial-scale mechanical recycling capacity.^{8,9} There is also reliance on downcycling the waste material into downgraded applications with significantly diminished recyclability, delaying, but not avoiding final disposal. This is different from the outcome of other typically and widely recycled waste materials, such as glass and cans.
- An anticipated solution, chemical recycling, is far from proven at commercial scale,¹⁰ with doubts over whether it should even be classified as an equal recycling technology to that of mechanical recycling.¹¹

As a direct result of the on-pack 'Recycle with bags at large supermarkets' labelling, Sainsbury's and Tesco are close to achieving their own ambitious packaging recyclability targets.

But supermarkets should also meet recyclability targets through the actual recycling of packaging waste.

As Tesco stated, "Increasing public awareness of the positive impact of reuse over recycling is also a role for campaigners, experts, opinion formers and media".¹² This report is intended to do just that.



Plastic-wrapped products displaying the 'Recycle with bags at large supermarket' label on soft plastic packaging

Recommendations

We're calling for the UK government to be bold and ambitious at the Global Plastic Treaty negotiations; to support a cut in global plastic production by 40% by 2040. And we want Sainsbury's and Tesco to publicly support this.¹³

We are calling on supermarkets to:

- Significantly reduce single-use non-essential plastic packaging use, including soft plastic packaging.
- Stop exporting collected soft plastic packaging waste.
- Be transparent with customers around the challenges presented by soft plastic packaging.

We are asking the UK government to urgently set the following targets:

- Cut plastic production through elimination by setting legally binding targets to reduce single-use plastic packaging by weight and by unit.
- Cut plastic production by setting legally binding reuse packaging targets.
- Remove plastic packaging from unprocessed fruit and vegetables by 2030.
- Ban all exports of UK plastic waste by 2027.
- Introduce an immediate moratorium on new incineration and energy-from-waste capacity across the UK.
- Prevent the uptake of chemical recycling as a treatment option for plastic, including packaging.

Based on the associated briefing prepared by ClientEarth titled 'Plastic recycling claims are misleading consumers' we are asking for:

- The UK CMA to intervene to ensure that plastic recycling claims are truthful and accurate, consider the full lifecycle and communicate that plastic packaging has an overall negative impact on the environment. The UK CMA must require supermarkets and other producers to substantiate claims about the recyclability of soft plastic packaging.
- Forthcoming guidance on the assessment of recyclability under the EPR scheme to contain sufficient safeguards to prevent plastic packaging without viable end markets or recycling capacity (i.e. soft plastics), from being advertised as recyclable.

Endnotes

1. Environmental Investigation Agency (2022) The Great UK Soft Plastics Scandal, [2022-EIA-The-Great-UK-Soft-Plastics-Scandal-Full-Brief.pdf](https://eia-international.org/wp-content/uploads/2022-01/The-Great-UK-Soft-Plastics-Scandal-Full-Brief.pdf) (eia-international.org)
2. See Appendix 3: Summary of take-back schemes
3. The last time UK supermarkets were surveyed by EIA and Greenpeace UK on their instore plastic footprint in 2019, they had collectively increased the amount of plastic packaging they used by 1.2% compared to 2017. Environmental Investigation Agency and Greenpeace (2021) Checking Out On Plastics III, <https://www.greenpeace.org.uk/wp-content/uploads/2021/01/Checking-Out-on-Plastics-III-FINAL.pdf> and WRAP (2022) Plastic Market Situation Report 2022, <https://www.wrap.ngo/sites/default/files/2023-10/Plastics%20Market%20Situation%20Report%202022.pdf> (Table 1)
4. Trackers were wrapped in bags, wrappers and packaging accepted by supermarkets collection points
5. Maier, J., Geyer, R. and Steigerwald, D.G. (2023) Curbside recycling increases household consumption, <https://www.sciencedirect.com/science/article/pii/S0921344923004056>
6. Burned for energy recovery either at a energy from waste facility or sent to a facility that produces RDF
7. As detailed in Appendix 5 of the full report, the possibility of contaminating the soft plastic with the trackers, and therefore tracking residual waste has been considered in detail and found to be very unlikely, not least because 8 trackers went to recovery facilities (66%) without pinging at other waste facilities able to sort through waste prior and so were likely not sorted in advance.
8. The Flexible Plastic Fund (2023) Flexible Plastic Fund FlexCollect Project Interim report, https://static1.squarespace.com/static/602a52a7ede5cc16ae71c9eb/t/65b75fd7419b171aac2ee220/1706609548052/FPF+FlexCollect+interim+report_Jan+2024
9. WRAP (2022) Plastic Market Situation Report 2022, <https://www.wrap.ngo/sites/default/files/2023-10/Plastics%20Market%20Situation%20Report%202022.pdf>
10. Plastic Recyclers Europe (2023) 2023 Flexible Films Market in Europe, https://www.plasticsrecyclers.eu/wp-content/uploads/2023/06/2023-Flexible-Films-Market-in-Europe-State-of-Play_June-2023.pdf
11. Center for Climate Integrity (2024) The Fraud of Plastic Recycling <https://climateintegrity.org/uploads/media/Fraud-of-Plastic-Recycling-2024.pdf>
12. Tesco (2022) [Use. Reuse. Repeat Report](https://www.tesco.com/press-releases/use-reuse-repeat-report)
13. Petition – Sainsbury's and Tesco: publicly support real action to cut plastic production – <https://you.38degrees.org.uk/p/hardtruthsoftplastic>

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