



The hard truth about soft plastic

How supermarket soft plastic take-back schemes are misleading customers

Authors

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Introduction

In 2021,¹ major UK supermarkets² started to introduce an initiative to tackle their growing³ plastic packaging footprint – front-of-store collection points to recycle soft plastic packaging (or take-back schemes).



As of October 2022, 6,027 stores were offering such collection points.⁴

This includes Sainsbury's and Tesco which – between them – hold 43% market share of the UK grocery retail sector.⁵ Both have widely rolled out soft plastic collection points. Tesco to all its large stores, and Sainsbury's to all its stores.^{6,7} These take-back schemes, which encourage customers to collect their single-use soft plastic packaging (synonymous with flexible plastic, bags, film and wrapping) at home and return it to the store,⁸ are said to aim to increase recycling rates and reduce plastic waste.⁹ A 2021 survey found that most of the UK public thought recycling soft plastics would be good (96%) and worthwhile (91%).¹⁰ Since then, awareness of take-back

schemes among citizens has grown – up from 31% in a 2023¹¹ survey to 48% in a 2024 survey.¹²

However, a number of issues with these schemes have been flagged since their introduction. A 2021 *ENDS Report*¹³ story found that Sainsbury's and Tesco had contracted the UK waste company Eurokey Recycling Ltd to export and reprocess (i.e. sort and decontaminate) their in-store collected soft plastics at Eurokey's facility in Zielona Góra, Poland. This facility received significant criticism from local communities about the way it was run. It was later revealed by Engineering & Technology (E&T) that Eurokey had its plastic packaging exporter permit temporarily suspended by the Environment Agency in November 2021 due to the nature of the plastic waste exports it had made.¹⁴

In March 2022, an investigative piece published by Bloomberg followed the journey of tracking devices placed in plastic bags and dropped in Tesco supermarket take-back schemes around London. Of the three tracking devices, two were exported – one ending up at a cement kiln via Eurokey's facility in Zielona Góra, Poland and the other at an industrial estate in Türkiye.¹⁵

This was followed by another *E&T* article in April 2022, in which Sainsbury's admitted that none of

the soft plastic collected through the take-back schemes was being recycled in the UK.¹⁶

Finally, a report titled '*The Great UK Soft Plastics Scandal*', written by the Environmental Investigation Agency (EIA) and published in June 2022, outlined a number of consequential problems associated with supermarkets collecting customers' soft plastic packaging for recycling, as well as the use of soft plastic packaging more generally.¹⁷

Tracking the truth: the investigation

As supermarkets continue to offer take-back schemes, we started to wonder if the findings from the previously mentioned investigations had been addressed. Of the soft plastic that supermarkets are collecting through front-of-store recycling points, is more now being recycled in the UK? If not, then what is actually happening to it?

To find out, Everyday Plastic and the 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 wrappers and dropped at the front-of-store collection points at Sainsbury's and Tesco stores. For the purposes of the investigation, we focused on Sainsbury's and Tesco,

given their market share and the fact that the schemes are in over 900 Tesco stores and in all Sainsbury's supermarkets.¹⁸

In this report, we ask:

- **What are supermarkets doing to tackle the plastic crisis?**
- **Is soft plastic labelled as 'recyclable' actually recyclable?**
- **Is the soft plastic packaging collected at Sainsbury's and Tesco supermarkets being recycled?**

The plastics crisis

The scale of the plastic crisis is staggering.

- Researchers warn that chemical pollution, also deriving from plastic use, threatens the stability of global ecosystems and human health.^{21 22 23}

- Plastic production is set to almost **triple** by 2060.¹⁹



- By 2050, global emissions from plastic production are estimated to account for one-fifth of the Earth's remaining carbon budget.²⁰

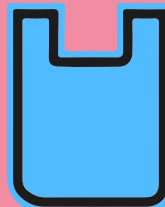
Of all the different types of plastic packaging, **soft plastics** are of significant concern.

- Latest estimates (from 2022) indicate that a staggering 2,082,000 tonnes were placed on the market, with nearly half (938,000 tonnes) being grocery packaging.²⁴

- Plastic packaging is the most dominant end-use sector for plastic consumption and is expected to remain so, with soft plastic packaging being the fastest-growing plastic packaging category.²⁵



- 2023 estimates show that over **215 billion** items of soft plastic packaging are placed on the market each year in the UK.²⁶



- The vast majority of local authorities, 88%, do not collect soft plastics at the kerbside for recycling.²⁸

- In 2022, soft plastic packaging was the second highest format arising from the consumer sector, with a share of 24% in the UK.²⁷

- In 2022, only 7% of soft plastics placed on the UK market were collected for recycling at the kerbside.²⁹



Policy setting

There are some government policies aiming to address issues stemming from the use of plastic packaging, including soft plastic packaging, these include:

1. UK Extended Producer Responsibility (EPR) for packaging³⁰

Since 1997, the UK has had Producer Responsibility obligations for packaging.³¹ What is required of producers (including suppliers and importers) has changed with time, with the latest legislative review taking place in 2023 after consultation on Extended Producer Responsibility for packaging in 2021.³² EPR is a new 2023 regulation replacing the current UK Producer Responsibility Obligations (Packaging Waste) Regulations, with its implementation occurring in phases. This includes a data collection phase in 2023 and a phased introduction of fees. EPR is a policy that ensures producers bear a significant degree of responsibility for the environmental impacts of their packaging throughout the product lifecycle. Until the introduction of EPR in the UK in 2023, plastic producers only contributed 10% to plastic waste management costs. The everyday citizen – through taxes – paid for the remaining 90%.³³ EPR is designed to reverse this imbalance, instead holding producers even more accountable for the environmental impact of their packaging.

Producer responsibility obligations, past and present, allow for plastic

packaging waste that is recycled to count towards the UK's mandated recycling target producer obligations if they pay for it. Producers can currently pay for plastic recycling credits to achieve these recycling targets by buying packaging recovery notes (PRNs) from waste companies that have an accredited reprocessor permit (henceforth a National Packaging Waste Database (NPWD) reprocessor permit) if the plastic packaging waste is recycled in the UK. They can also buy packaging export recovery notes (PERNs) from companies that have an accredited exporter permit (henceforth NPWD exporter permit) if the plastic packaging waste is exported to be recycled. These waste companies are also required to be a registered UK Waste Carrier/Broker/Dealer.

Since the beginning of 2021, these obligations only allow the sale of a PRN/PERN if the plastic packaging waste is recycled. Previously, PRN/PERNs that were sold for plastic packaging that was recovered (i.e. incinerated for energy recovery or reprocessed to be used as fuel) also counted towards these mandated recycling targets.³⁴ Plastic packaging waste can still be exported for recovery; however, since 2021 it cannot be claimed as a plastic recycling credit.

2. Mandated recyclability and recycling targets

The UK government has also adopted targets related to the above. This includes a 61% plastic packaging annual recycling obligation for producers, which has been in effect

since 2022.³⁵ In 2022, the latest year with publicly available data, the UK is estimated to have achieved a plastic packaging recycling rate of 51.5%.³⁶ Some in the industry state that previous packaging recycling targets have not been met and that the UK is not set to achieve its 2025 target either.³⁷

Concurrently, within the Government's 2018 Waste and Resources Strategy for England, one of its key milestones was to work towards all plastic packaging being reusable, compostable or recyclable by 2025.³⁸ This also exemplifies how theoretical recyclability does not infer actual recycling.

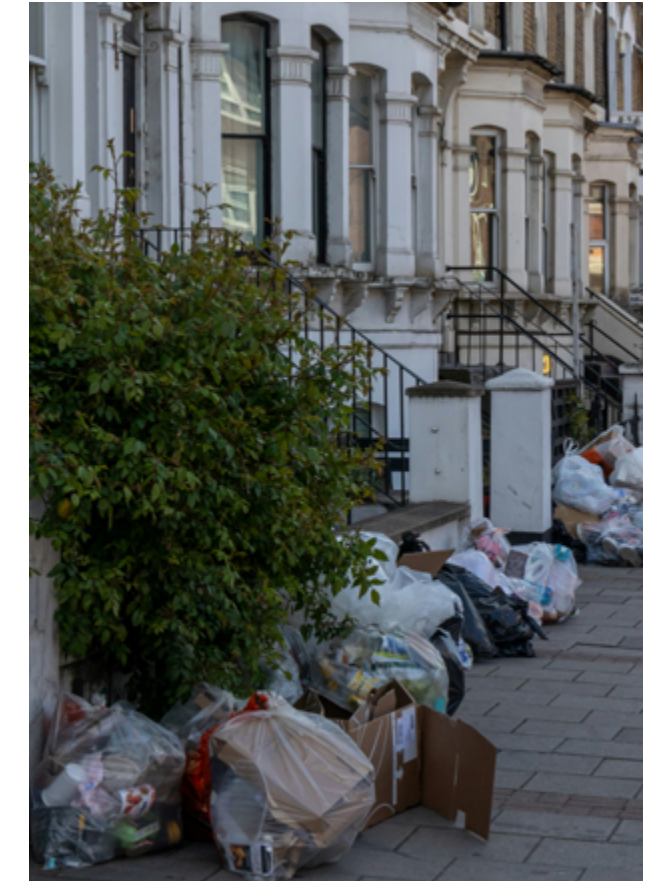
3. UK Plastic Packaging Tax

On 1 April 2022, HMRC introduced the Plastic Packaging Tax (PPT), which producers must pay on any pieces of plastic packaging that are not made with at least 30% recycled plastic.³⁹ Plastic packaging components that are made of 30% or more recycled plastic are not subject to the PPT. The PPT was introduced to incentivise producers, retailers and brands to minimise plastic waste and encourage investment in recycling.

4. Soon-to-be introduced kerbside collections of soft plastic waste in the UK

In April 2023, it was reported that *"The number of local authorities collecting plastic films and flexibles (i.e. soft plastics) as part of their kerbside collection service has declined for the 5th consecutive year."* – despite already being very small (please refer to The Plastics Crisis section).⁴⁰ But

from March 2027, kerbside collection of soft plastic packaging for recycling will be mandatory for all local authorities across the UK.



Plastic rubbish bags out on a street's kerbside

5. Special recycling labels for soft plastic packaging and contribution towards mandated recycling targets

Defra proposed an interim recycling labelling solution (more details on labelling in Section 3) for soft plastic packaging to ensure people continue to recycle it – either instructing consumers to take their used soft packaging to the nearest front-of-store collection point or to check whether their local authority collects it.⁴¹ Producers are then able to offset this packaging against their obligated recycling targets (as outlined above).⁴²

Citizen demand

A recent poll conducted by City to Sea showed that 83% of consumers are concerned about plastic pollution in their weekly shop,⁴³ and it's easy to see why. To the everyday shopper, plastic is everywhere and covering everything.

Everyday Plastic and Greenpeace UK's The Big Plastic Count UK in 2024⁴⁴ revealed that 81% of the plastic waste thrown away by people across the UK came from food and drink packaging, illustrating that it is practically impossible to avoid, especially in supermarkets where plastic wraps so much: fruit and vegetables, snacks, dried goods like pasta and rice, bakery items and pet food pouches are brought into our homes weekly.

The act of recycling is widely considered to be a pro-environmental behaviour,⁴⁵ and **66% of shoppers believe that collecting their soft plastic and returning it to a front-of-store collection point at the supermarket to be recycled is beneficial for the environment.**⁴⁶ But interestingly, research has shown that people can produce more waste when they think it will be recycled.⁴⁷

Sainsbury's

"The front of store recycling points will make it easier than ever for customers to make more sustainable choices by offering a trustworthy recycling system where they can correctly dispose of flexible plastic packaging. This includes packaging such as crisp packets, food pouches, salad bags and biscuit and cake wrappers which 83% of UK local authorities currently don't accept for recycling."⁴⁸

TESCO

"The collection points will allow customers to return all their previously unrecycled soft plastic, such as the clear film used to wrap meat and fish, crisp packets, fruit and veg bags and sweet wrappers, rather than having to throw it away. Most councils don't collect soft plastic from homes for recycling so it typically goes to waste."⁴⁹



What are supermarkets doing to tackle the plastics crisis?

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 there has been an increase in soft plastic packaging placed on the UK market.



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 is claiming to recycle soft plastic packaging, which is contributing to achieving their recyclability targets, despite the material being widely acknowledged as hard to recycle.

The reduction of plastic packaging, including hard-to-recycle, single-use, non-essential packaging such as soft plastic packaging, is clearly needed and has been stated for some time.⁵⁰ The potential for action from

supermarkets to reduce their plastic footprint is significant. Greenpeace UK reported that UK supermarkets could achieve a minimum 50% reduction in single-use plastic packaging, simply by removing certain packaging altogether and implementing reuse systems.⁵¹ In addition to reducing bottle packaging through the use of Deposit Return Schemes, soft plastic packaging for products such as bananas, potatoes, rice, cereal, and pasta, presents the greatest scope for significant plastic reduction.

The Ellen MacArthur Foundation reinforced the urgency to prioritise this when it reported that **"Current direct elimination efforts are only just scratching the surface and need to be urgently scaled [...] and is particularly necessary for flexibles (i.e. soft plastics) due to the inherent limitations of substitution and recycling"**.⁵²

Justifying the need for plastic packaging

The waste hierarchy, legally enshrined in the UK,⁵³ prioritises elimination over either material reduction or material substitution, as it not only prevents material use but also eliminates the need for any after-use (i.e., waste treatment) infrastructure. To align with the waste hierarchy, the focus should be placed on the need to remove the material in the first place.⁵⁴ Supermarkets are legally required⁵⁵ to take all reasonable measures to apply the waste hierarchy, as they are entities that produce or handle waste.

But supermarkets, as well as other industries, emphasise the need for soft plastic and packaging.

This is despite research that saw the justification for using plastic packaging to extend shelf life, or as a protective material, begin to unravel.⁵⁶ For example, Tesco has claimed that “a cucumber wrapped in soft plastic lasts three times longer than one left unwrapped”.^{57 58 59} However, WRAP published a report in 2022 presenting its findings from having tested the shelf life of cucumbers under both refrigerated and room temperature

Sainsbury's

“Packaging helps us deliver fresh, undamaged produce, but we know that it can have a negative impact on our planet.”⁶¹

TESCO

“Soft plastics are an important part of our packaging portfolio – they play a significant role protecting and preserving the food we sell. They provide a lightweight, food-grade solution which can help prevent food waste.”⁶²

storage conditions. It was found that the shrink wrap did not increase the shelf life at either storage temperature. From their study, WRAP concluded that selling uncut fresh produce loose in five key product lines (apples, bananas, broccoli, cucumber, and potatoes) could prevent 100,000 tonnes of household food waste and around 10,300 tonnes of plastic packaging (most likely soft plastic packaging for these food categories).⁶⁰

The UK Plastics Pact

The UK Plastics Pact is a multi-stakeholder initiative led by WRAP. Most UK supermarkets and many brands, including Sainsbury's and Tesco, pay for membership.⁶³

Plastics Pact members are responsible for over 75% of all consumer plastic packaging placed on the market in the UK.⁶⁴ Their actions have a significant impact, and, as a consequence, so do the voluntary targets and actions of the UK Plastics Pact.

This includes “*The ambition of The UK Plastics Pact is for supermarkets to provide widespread collection points for plastic bags and wrapping in advance of kerbside collections*”.⁶⁵

As paying members, supermarkets have committed to tackling the issue of plastic waste through the four voluntary UK Plastics Pact targets, building on government obligations already in place. Their 2025 targets are:

1. Eliminating problematic or unnecessary⁶⁶ single-use packaging
2. 100% of plastic packaging to be reusable, recyclable, or compostable
3. 70% of plastic packaging to be effectively recycled or composted
4. 30% average recycled content across all plastic packaging

But as further detailed in Appendix 4, which shows each target with its significance to soft plastic (collection of which is not included in their targets)⁶⁷:

- **Slow progress means 2 out of 4 targets will not be met by 2025. WRAP attributes this to delays in Government policy.⁶⁸**
- **It is our opinion that just one of the four targets is focused on elimination, and only since a revision in February 2022 does this formally relate to soft plastic packaging.**
- **We believe that target attainment is negatively impacted by the continued use of soft plastic packaging.**

Supermarket targets

In addition to being UK Plastics Pact members, some UK supermarkets also have individual strategies and targets in place to address their plastic packaging footprint. Since 2018, EIA and Greenpeace UK have been surveying the top 10 UK supermarkets on what those targets are and the progress that has been made towards them,⁶⁹ including targets on reduction, reuse and refill, recyclability, and recycled content. So, what progress has been made towards recyclability and reduction targets, since supermarkets were last surveyed in 2019? Using Sainsbury's and Tesco as examples, it is possible that soft plastic packaging supermarket take-back schemes have enabled supermarkets to closely achieve their recyclability targets, while at the same time not addressing the amount of soft plastic packaging used within their reduction targets despite it being harder to recycle (more on that below).

Recyclability

Sainsbury's set the target that 100% of its own-brand plastic packaging is reusable, recyclable or compostable by 2023,⁷⁰ while Tesco has the objective that all its packaging will be fully recyclable by 2025.⁷¹ Unlike the UK Plastics Pact's method for calculating plastic packaging recyclability, however, it seems both supermarkets are now counting soft plastic packaging as recyclable as a result of supermarket take-back collection schemes.

For example: within its 2023/24 Sustainability Update Report, Sainsbury's stated that 89.7% of its food plastic packaging was fully recyclable. It also stated that this performance was impacted by the delay of unified recycling across the UK and the lack of alternative materials to replace types of plastic packaging, such as PET film.⁷² Given the statement that its in-store collection schemes allow customers to recycle polypropylene (PP) film, it is assumed that at least PP film has been counted as recyclable within this target.⁷³ In 2019, before supermarket take-back schemes for soft plastic packaging were established, Sainsbury's had a 69% recyclability rate.⁷⁴

Within their 2023 Plastic and Packaging Report, Tesco stated that 96% of its packaging is fully recyclable through kerbside, recycling collection points, and soft plastic collection points in its stores.⁷⁵ Similarly, in 2019 Tesco had a 67% own-brand and a 58% branded plastic packaging recycling rate.⁷⁶

While these increases in recyclability rates can also be attributed to the elimination of other non-recyclable plastic packaging formats – as noted by both supermarkets – the ability to count soft plastic packaging has played a role in achieving these rates.

Reduction

In the absence of a government-mandated plastic packaging reduction target, all top 10 UK supermarkets outlined their voluntary reduction targets in EIA and Greenpeace UK's latest survey in 2021.⁷⁷

Sainsbury's

Aiming for an absolute 50% reduction target for primary and own-brand packaging by 2025, using a 2018 baseline of 69,839 tonnes.^{78 79} This is a target of placing 34,920 tonnes of own-brand plastic packaging on the market by 2025. Since then, Sainsbury's latest data shows a packaging reduction of 17.5% in 2022 to 57,624 tonnes, which then rose to 58,379 tonnes in 2023.⁸⁰

In addition to elimination, a key method to help reduce overall levels of single-use plastic packaging is the adoption of reuse and refill packaging systems. Whilst trials^{84 85} for alternative reuse and refill packaging models have been run by several major supermarkets, the momentum to deliver these at scale would appear to have stalled due to a lack of financial viability in the short term⁸⁶ and supportive policy encouraging its widespread uptake to achieve economies of scale.

While supermarkets, including Sainsbury's and Tesco, have removed

TESCO

Aimed to reduce their plastic packaging by 1 billion pieces and 'all unnecessary plastic packaging' by 2020.⁸¹ Since then, in 2023, Tesco stated it had removed 2 billion pieces of plastic packaging in total,⁸² with one quarter of this amount being attributed to the removal of pieces such as yoghurt pot lids and plastic windows in doughnut packaging.

In 2020, Tesco placed a total of 139,720 tonnes of own-brand plastic packaging on the market. In 2022, it placed a total of 133,835 tonnes.⁸³

and reduced plastic packaging formats over time – some of which include soft plastic packaging⁸⁷ – they may also concurrently be relying on the lightweight nature of soft plastic packaging to reduce the overall weight of the plastic packaging they place on the market. Although we do not have up-to-date individual supermarket data on their soft plastic packaging use, the latest data indicates that the consumer packaging sector, including supermarkets, is switching from harder and heavier plastic packaging to softer and lighter plastic packaging – a practice widely referred

to as lightweighting. In the case of Sainsbury's and Tesco, their current voluntary plastic packaging reduction targets do not necessarily prevent this from happening.

Sainsbury's

Switched beef mince plastic trays with a vacuum-packed alternative, which uses 55% less plastic by weight, as part of its aim to halve use of plastic packaging in Own Brand products by 2025.⁸⁸



TESCO

Removed the trays from their pre-packed chickens, saving 14.2 million pieces of plastic a year. This forms part of its goal to remove plastic from 5 billion products by 2025.⁸⁹



In 2022, WRAP published a report stating that there was limited change in plastic packaging placed on the UK market between 2019 and 2021. However, there have been substantial shifts in packaging by format – indicating a movement away from rigid packaging towards lightweight and flexible packaging (i.e., soft plastic packaging).⁹⁰ Valpak data indicates a 5% increase in consumer plastic packaging film between 2019 – 2022.⁹¹

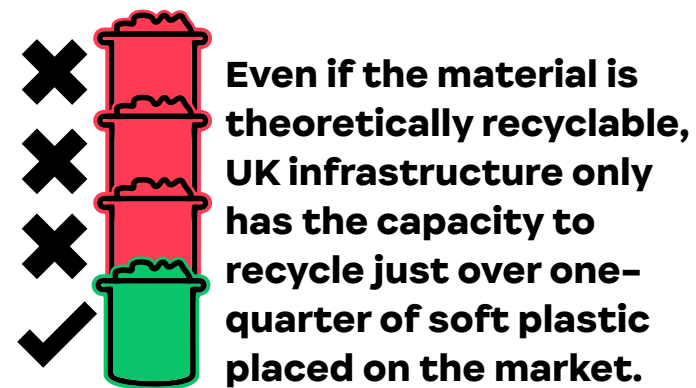
Total plastic packaging reduction initiatives across the consumer sector, including the grocery retail sector, suggest that they may be seeking to reduce their plastic footprint by maintaining⁹² and even creating **MORE** lightweight soft plastic packaging.

In response to Everyday Plastic and EIA, Sainsbury's stated that: "We share your concerns on plastic packaging and its impact on the environment. That's why in 2019, we set a target to reduce our own-brand packaging by 50%. A large part of this journey has been looking at ways to reduce the amount of plastic packaging we put into the market. So far, **this has involved lightweighting, using alternative material sources and removing thousands of tonnes of plastic from our supply chain and customers' homes altogether.**"



Is soft plastic labelled recyclable, actually recyclable?

Soft plastic is acknowledged by the waste management industry and the UK government as incredibly challenging to recycle. Despite the widely recognised issues for recycling soft plastic, take-back schemes – like Sainsbury's and Tesco – accept all soft plastic packaging as well as bags.



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.

The UK is currently limited to commercial-scale mechanical recycling capacity.^{93 94} In addition, potentially downcycling the waste material into other, downgraded applications with significantly diminished recyclability is delaying, but not avoiding final disposal. An anticipated solution, chemical recycling, is far from proven at commercial scale,⁹⁵ with doubts over whether it should even be classified as an equal recycling technology to that of mechanical recycling.⁹⁶

This lack of a recycling solution is a key reason behind the introduction of supermarket soft plastic take-back schemes, which in turn have resulted in the expansion of OPRL's on-pack 'Recycle with bags at large supermarkets' labelling which is now seen across an extensive range of soft plastic packaging.⁹⁷ Both the schemes and the labelling are seen as important catalysts in stimulating a market for soft plastic recycling prior to its UK-wide kerbside collection in 3 years' time.

As a direct result of the OPRL labelling – which saw the majority of soft plastic packaging switch from 'Do not recycle' to 'Recycle with bags at large supermarkets', Sainsbury's and Tesco is close to achieving their ambitious packaging recyclability targets.

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


With the likely shift toward an increasing reliance on consumer soft plastic packaging, along with

the roll-out of take-back schemes, this section reviews evidence regarding the extent to which post-consumer soft plastic (like the soft plastic packaging waste collected by supermarkets) is recyclable, and the use of soft plastic packaging recycling labelling.


What is post-consumer soft plastic?

Post-consumer soft plastic (such as supermarket soft plastic packaging waste) encompasses many different types of plastic polymers (with PE and PP being the most prominent), as well as multi-material films, that also include contaminants such as ink, adhesives, and food waste.⁹⁸ This complexity makes it a considerable challenge for recycling.⁹⁹

(Polyethylene) has a number of applications including HDPE and LDPE, and is widely used in food packaging such as bread bags and banana bags.¹⁰⁰



(Polypropylene) is a type of plastic commonly used for items such as salad bags, frozen food bags and rice packaging.¹⁰¹



How is 'recyclable' defined?

The UK government defines 'recyclable waste' as household waste that is capable of being recycled or composted.¹⁰² However, it is important to note that rate of collection and actual recycling also form important facets as to whether or not a waste can be deemed recyclable. For example, plastic packaging is defined by WRAP as recyclable "if its successful post-consumer collection,

sorting, and recycling is proven to work in practice and at scale".¹⁰³ Soft plastic collected via supermarket collection points does not satisfy this definition and therefore was not counted towards WRAP's UK Plastics Pact recyclability target.

A more detailed definition is used by Plastics Recyclers Europe (PRE) and the Association of Plastics Recyclers (APR) in the USA, in which plastics must meet four conditions for a product to be considered recyclable. PRE went on to publish

a report stating "currently there is little recycling of non-PE flexible films, and in addition no current mechanical approach to separating different polymer layers exists".¹⁰⁴

According to the Plastics Recyclers Europe (PRE), plastics must meet four conditions for a product to be considered recyclable:

1. The product must be made with a plastic that is collected for recycling, has market value, and/or is supported by a legislatively mandated program.
2. The product must be sorted and aggregated into defined streams for recycling processes.
3. The product can be processed and reclaimed/recycled with commercial recycling processes.
4. The recycled plastic becomes a raw material that is used in the production of new products.

The EU has recently revised its definition of whether packaging is deemed recyclable - in the EU packaging is now only considered recyclable if (1) it is designed for material recycling and if recycled, the material is of a sufficient quality to the original material and that (2) it must be recycled at scale - being equal to or greater than 55%.¹⁰⁵

Based on data currently available, as cited throughout this report, our opinion is that UK soft plastic packaging does not satisfy these definitions. Despite the widely recognised challenges for recycling soft plastic, particularly with non-PE types, there is widespread use of a range of polymers in soft plastic packaging (both a mix of film types and multilayers). When we examine what is being placed on the market, 62% of film is non-PE.¹⁰⁶ The UK government also deems soft plastic packaging as hard-to-recycle and of poorer quality,¹⁰⁷ yet front-of-store collection points at Sainsbury's and Tesco place very few restrictions on what is accepted.^{108 109}

TESCO

"Customers can bring all types of soft plastics to our collection points. This includes everything from crisp and salad packets to microwavable pouches, bread wrappers, and shrink wraps - no matter where it was purchased."¹¹⁰

Sainsbury's

"allowing customers to recycle all flexible plastic packaging which is not commonly accepted for kerbside collection by local authorities."¹¹¹

Can soft plastic be recycled in the UK?

The UK government and the EU define recycling as any operation by which waste is reprocessed into products, materials, or substances for either its original or other purposes. It doesn't include energy recovery, reprocessing into materials that are to be used as fuels or backfilling operations.¹¹² Despite the UK government deeming soft plastic packaging as hard-to-recycle and of poorer quality,¹¹³ it still allows its recycling, including that which is exported for recycling, to count towards mandated producer recycling targets.¹¹⁴

The primary solution for recycling soft plastic is a process called mechanical

recycling (to sort, shred, flake, wash, separate by density and extrude soft plastic after it has become waste) to produce plastic granulates or flakes. Due to the contaminants present in household soft plastic packaging waste, as well as safety standards, the output is reduced in quality and therefore can not be used in food-grade soft plastic packaging as recycled content,¹¹⁵ only in downgraded applications which are less demanding such as bin bags, plastic 'wood', and damp proof membrane. The resulting downcycled products have even greater diminished recyclability, therefore delaying but not avoiding final disposal.



Multiple kinds of plastic being hand-sorted on a conveyor belt by factory workers

'Hard-to-recycle'

Soft plastics have been commonly referred to as 'hard-to-recycle'; WRAP's reporting demonstrates that referring to soft plastic as anything but 'hard-to-recycle' is a tough habit to change. In November 2023, when referencing a new facility boasting more advanced technology than mechanical recycling, WRAP used the phrase "currently 'unrecyclable' waste plastics, such as films and flexibles".¹¹⁶ Also, in its 2019/20 Plastics Pact Progress Report, WRAP states that, "Two thousand tonnes of nonrecyclable material collected and recycled by retailers through front of store collections or take-back schemes has been included in progress towards Target 2".



Hundreds of crisp packets laid flat on a concrete floor. © Everyday Plastic

One of the reasons that soft plastic packaging is considered hard-to-recycle is that the end recycling market in the UK is limited. In 2021, WRAP estimated that all UK plastic film packaging recycling capacity was around 190,000 tonnes, "with the large majority dedicated to commercial and industrial (C&I) film with only a small percentage available for post-consumer film"¹¹⁷ which "are much less commonly recycled than C&I films which have much more infrastructure dedicated to their recycling."¹¹⁸ Soft plastic packaging waste from supermarkets is deemed post-consumer. In the same report, WRAP estimates these being 341,000 tonnes of consumer soft plastic packaging and 324,000 tonnes of non-consumer, inferring the UK only had the capacity to recycle 28.6% of all soft plastic placed on the market. It also estimated that by 2026, an additional 115,000 tonnes of recycling capacity would be installed for plastic film – the equivalent capacity for 46% of all plastic film placed on the market in 2021.¹¹⁹ 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).

But it is also important to note that other industry reports have higher total estimates of soft plastic placed on the market.¹²⁰ **This includes a current estimate showing that 895,000 tonnes of flexible plastic packaging are placed on the market each year in the UK (from households and businesses).**¹²¹

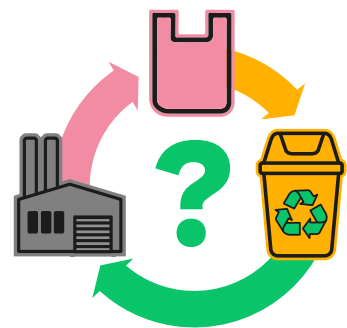
The Yes Recycling plant, a mechanical soft plastic recycling facility in Fife, Scotland, opened in September 2022 and was co-owned by Morrisons¹²⁵ (50%) and recycling plant specialists Yes Recycling. Ecosurety, along with several other organisations, including Nestlé UK & Ireland (providing a £1.65 million ‘pre-investment’)¹²⁶ and Zero Waste Scotland¹²⁷ were involved in the £10 million development. Yes Recycling was hailed as a first-of-its-kind facility, ushering in a new era where soft plastics could be recycled at scale in the UK, where it would downcycle hard-to-recycle soft plastic packaging into a new product called Ecosheet, which can be used in the construction and agriculture industries.¹²⁸ In April 2023 the facility entered administration.^{129 130} It was stated that this was because it was unable to pay its debts after suffering cash flow problems linked to operating under capacity (i.e. not receiving enough soft plastic packaging waste).¹³¹



The lack of UK recycling capacity is a widely recognised issue. In an effort to address this, supermarket soft plastic collection schemes are being used to grow the number of effective end markets^{122 123} ahead of the proposed collection across the UK in 2027.

Kerbside collection of soft plastic has now been initially tested and reported on, as stated in The Flexible Plastic Fund’s 2023 ‘FlexCollect’ report: “collections, sorting and recycling trials are still being undertaken and the process ‘industrialised’.”¹²⁴

Can soft plastic be closed-loop recycled?



Closed-loop recycling refers to the process by which post-consumer waste is collected and recycled,

preserving the value of the material so it can be used again to produce the same product category it originated from, with minimal loss of quality or function, in a continuous circular loop.¹³²

When it comes to the plastic packaging tax, government guidance states that to be classified as recycled plastic, the plastic waste

must have been reprocessed so that it can be used as a raw material in manufacturing another plastic packaging component. Examples of processes involved in reprocessing plastic waste can include re-melting and compounding to re-pelletise or create granules (amongst others).¹³³ This does not necessarily include only packaging for food. Other examples of consumer packaging within the scope of the tax include certain types of plastic bags (bin liners, refuse sacks, carrier bags, food bags) and pallet wrap. Bags for life are out of scope for the tax.¹³⁴ However, non-food packaging – such as bin liners – would be disposed of after use rather than recycled again, so it is not necessarily closing the loop.

Within Defra’s Impact Assessment for the 2021 consultation on Extended Producer Responsibility, it stated that no mechanical recycling processes are currently accepted by the UK Food Standards Agency as suitable for producing recyclate for incorporation into food contact plastic film packaging (i.e. soft plastic packaging). This infers that all soft plastic packaging placed on the market is subject to the plastic

Finding solutions to enhance circularity is needed, but this is not straightforward. The Ellen MacArthur Foundation states that flexible (soft) packaging is **“by far the most challenging market segment to address on the journey towards a circular economy for plastics”**.¹³⁸ Whilst the scope for innovation in this area may well be

packaging tax, and their recycling is not closed-loop in nature.¹³⁵

Tesco makes claims that infer its soft plastic collection points go beyond recycling in their marketing communications, explaining that efforts to recycle soft plastic are helping to close the loop. Sainsbury’s discusses the concept of the circular economy more broadly, in relation to its approach to recycling.

Sainsbury’s

*“Support the expansion of circular economy supply chains through our recycling approach.”*¹³⁶

TESCO

*“It’s why we are committed to creating a system where we minimise single use plastic and ensure everything we use can be recycled as part of a closed loop.”*¹³⁷

huge, it does not seem accurate to say that soft plastic being collected is in any way connected to the development of a circular economy or a part of a closed-loop, given its limited ability to be recycled back into other packaging formats like food-grade packaging using environmentally-sound, already established recycling technology.¹³⁹

What about chemical recycling?

Due to the limitations of mechanical recycling, chemical recycling (which encompasses a number of methods aimed at creating virgin-like polymers from plastic waste) is considered part of the solution to soft plastic recycling, along with hopes for closed-loop recycling for soft plastic packaging.¹⁴⁰

This potential solution has seen significant interest from the private sector and the UK government, with research funding streams and investment being made available.¹⁴¹ However, chemical recycling is less environmentally sound than mechanical recycling, generally requires homogeneous feedstock (i.e., types of waste), lacks transparency in terms of data on the ability to meet decontamination thresholds and diverts focus away from upstream measures in handling unrecyclable or hard-to-recycle waste (like reduction).¹⁴² There is currently little to no commercial-scale UK chemical recycling capacity.¹⁴³ Additionally, key players have recently announced their withdrawal from this approach.¹⁴⁴

Questions have also been raised about whether chemical recycling should be placed lower in the recycling hierarchy, largely due to the energy intensity of the process itself. As the Green Alliance stated, *“In the case of plastics, new chemical recycling technologies are being touted as offering endless possibilities for creating new products. But, to keep*

*material circulating at the highest value, we propose a recycling hierarchy that prioritises mechanical recycling ahead of these novel technologies, as it uses the least energy.”*¹⁴⁵

What happens to soft plastic packaging waste when it isn't recycled?

When recycling is not an option, treatment options further down the waste hierarchy occur. The next treatment option after recycling within the waste hierarchy is recovery (which includes converting waste to energy via incineration at energy recovery facilities and the production of Refuse Derived Fuel pellets which are commonly used by industry, such as to power cement kilns). The last treatment option of the waste hierarchy is disposal (i.e. landfilling and incineration without energy recovery).

Instances where soft plastic packaging waste is turned into refuse-derived fuel or incinerated for energy (i.e. recovery) is very likely linked to the limited mechanical recycling capacity available for this waste material stream. As already identified, the latest published data on the recycling capacity for soft plastic in the UK was reported as being 190,000 tonnes per year in 2021. UK incineration capacity, however, is in excess of 18.5 million tonnes – and the amount of waste that is sent to

be incinerated has risen by 435% in the last 20 years.¹⁴⁶

The incineration of plastic waste for energy production is not without issue. By way of example, Cory, a waste management company that has incineration for energy recovery facilities in the UK, undertook a compositional analysis of the waste it received to burn for energy in 2022. It found that while representing only 16% of residual waste by weight, plastic contributed 65% of the carbon emissions.¹⁴⁷ The composition analysis also showed that plastic packaging film (i.e. soft plastic) contributed significantly in residual waste composition, with Cory calling for immediate action on the inclusion of plastics in non-recyclable waste.¹⁴⁸ Concurrently, Cory highlights on its website that *“only a small proportion of plastic film (i.e. soft plastic) is recycled, due to challenges with its collection, sorting and recycling as well as end markets”*.¹⁴⁹

Why is some soft plastic packaging labelled recyclable?

On-pack recycling labelling (OPRL) is a membership-based labelling scheme operated by not-for-profit OPRL Ltd, under an exclusive licence from WRAP to use the ‘Recycle Now’ iconography. Under the scheme, OPRL Ltd sub-licenses this right on an annually renewable basis to any company designing, manufacturing, or placing own-brand or branded consumer packaging on the UK market, whether

or not they are themselves based in the UK.¹⁵⁰ OPRL is responsible for the familiar recycling certification labels that appear on many products across all packaging types in the UK. Both Sainsbury’s¹⁵¹ and Tesco¹⁵² have highlighted their partnership with OPRL. The three recycling labels are detailed below:



Placed on plastic packaging if 75% or more of UK local authorities collect this type of packaging which is then effectively sorted, processed, and sold as recycle for use in new packaging or products.¹⁵³



Placed on plastic packaging if fewer than 50% of UK local authorities collect this type of packaging and/or it is not effectively sorted, processed or sold as recycle for use in new packaging or products.¹⁵⁴



Front-of-store collections enable at least 75% of the population to access collection services feeding reprocessing infrastructure and as a consequence achieves an apt potential collection rate to be deemed recyclable.¹⁵⁵

Prior to the establishment of supermarket soft plastic take-back schemes in 2021, practically every piece of soft plastic packaging placed on the UK market would have most likely been deemed (and thus labelled) as non-recyclable. The creation of these collection schemes, however, allowed some soft plastic packaging to carry the OPRL label of 'recycle with bags at large supermarkets'.

The label must only be used on plastic bags and wrapping that can be recycled through front-of-store collection points and must be either mono PE or PP packaging, or any mixed polyolefin packaging.¹⁵⁶

The inclusion of PP soft plastic packaging was introduced in 2022 as a result of "the traceability and audit commitments under the Flexible Plastics Fund [giving] full assurance, with 80% of the volumes collected to be processed here in the UK".¹⁵⁷

At the time of the launch of the updated labels, the then Executive Director of OPRL Ltd was quoted as saying, "We're very conscious that our labels are trusted by consumers because they constitute a 'promise'; 95 percent of people are confident they understand our 'Recycle' label and that if they put packaging bearing it in the right bin then it will be recycled. We respect and value that trust, built up over 12 years of labelling packaging. So we're committed to verifying the necessary infrastructure is in place to deliver on that promise, and that markets exist to make this an economically viable and sustainable process. The partnerships that have

come together to deliver these industry initiatives are powerful drivers of change so we hope that evidence confirming the scale of accessible infrastructure and markets will be forthcoming very soon. That will enable us to give a simple and clear message to consumers, making it easier to engage them in active recycling."¹⁵⁸

These labels are designed to communicate to the public what soft plastic packaging can theoretically be recycled and where to place it for recycling.^{159 160} But they may also imply to the public that labelled soft plastic packaging **will actually be recycled**. Furthermore, it is our understanding that they infer the majority of OPRL-labelled soft plastic packaging volumes collected are to be processed in the UK.



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

As outlined within this report, we know that:

- Whilst supermarket take-back schemes increase the potential for collection, that does not mean high levels of soft plastic packaging will be returned to supermarket take-back collection points.
- In addition, estimates indicate that there is limited capacity to recycle this waste stream in the UK, which in 2021 was just over one-quarter¹⁶¹ of soft plastic placed on the market in the UK. But only a small percentage of this capacity is dedicated to post-consumer soft plastic recycling.
- 62% of film placed on the market is made of non-PE polymers, recognised as being particularly challenging to recycle.¹⁶²



The impact of OPRL is marked. Sainsbury's specifically refer to OPRL when they report a "year-on-year increase mainly due to a change in OPRL industry labelling guidance for PP film moving from 'do not recycle' to 'in-store recycling'".¹⁶³

OPRL labelling for soft plastic packaging, in combination with take-back schemes, is enabling Sainsbury's and Tesco to claim that a substantial amount of their soft plastic packaging is now recyclable, and in turn, **these supermarkets can now assert that they are close to achieving their plastic packaging recyclability targets.**

Sainsbury's

Have a target for 100% own brand food plastic packaging to be fully recyclable by 2023 reporting year.

In its latest 2023 report, 89.7% was reported as recyclable.¹⁶⁴

TESCO

"By 2025 Our packaging will be fully recyclable".¹⁶⁵

In 2023 Tesco reported "96% of our packaging is fully recyclable through kerbside collection, recycling collection points or the soft plastic collection points in our stores."¹⁶⁶






Is the soft plastic packaging collected at Sainsbury's and Tesco supermarkets being recycled?

Since July 2023, Everyday Plastic has been monitoring tracking devices in soft plastic packaging bundles placed in Sainsbury's and Tesco front-of-store collection points.

The outcomes of the investigation have revealed both consistencies and inconsistencies – while it seems 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, where it subsequently ends up appears to be unsystematic.

 **Our results show that of the trackers whose final destination we were able to ascertain (50% of Sainsbury's and 33% of Tesco trackers, respectively) none of the soft plastics bundles placed in front-of-store collection points were closed-loop recycled.**

Instead, it seems that there is a reliance on burning the plastic collected at supermarkets, either

through energy recovery or as fuel, or downcycling. Export also appears to be commonplace, with plastic being sent abroad for downcycling and incineration for energy as well. These results indicate **just how hard it is to recycle post-consumer soft plastic packaging in the UK.**

Starting with the distribution of trackers in July 2023 through to the publication of this report in September 2024, the investigation spans 14 months and incorporates public polling, primary research, working with our partners, in addition to monitoring the tracking devices.

We packaged the trackers into bundles of soft plastic packaging listed as acceptable by Sainsbury's and Tesco ensuring the trackers were secured and protected within the bundles. These were sent to 22



A volunteer packing and concealing an Apple AirTag tracking device into soft plastic packaging © Everyday Plastic

volunteers across England, from Newcastle to Penzance, Margate to Whitehaven, and from Norwich to Bristol.






The Apple AirTags send out secure Bluetooth signals to nearby iPhones or other Apple hardware and are tracked through the Find My app. Tracking relies on the close proximity of nearby devices to send 'pings' to the investigation teams' iPhones. The team recorded the data each time the trackers pinged at a new location. Locations were determined through online map software and cross-

referenced through desk-based research. For more information on the methodology, assumptions and naming of certain companies identified please refer to Appendix 5.


Most significantly, we found that none of the forty tracked bundles whose final destinations were determined were closed-loop recycled. There is also a stark difference in final outcomes between the tracked bundles of soft plastic dropped at Sainsbury's and those at Tesco.

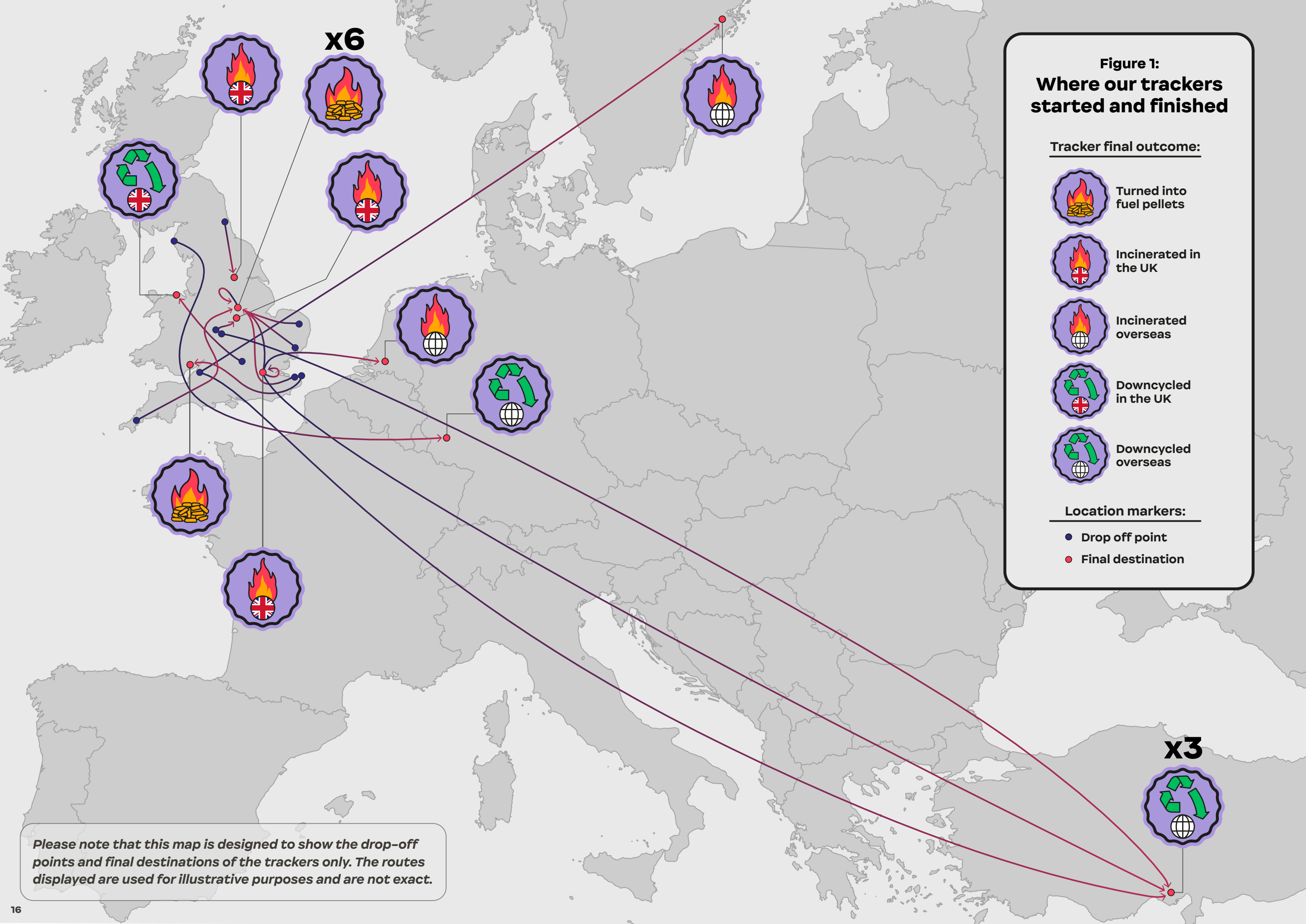
**Figure 1:
Where our trackers
started and finished**

Tracker final outcome:

-  Turned into fuel pellets
-  Incinerated in the UK
-  Incinerated overseas
-  Downcycled in the UK
-  Downcycled overseas

Location markers:

-  Drop off point
-  Final destination



x6

x3

Please note that this map is designed to show the drop-off points and final destinations of the trackers only. The routes displayed are used for illustrative purposes and are not exact.

The tracked bundles of soft plastic packaging travelled more than 25,000 km through a complex waste system across the UK, Europe and beyond.

**Figure 2:
Sainsbury's soft plastic tracker journeys**







A total of 17 trackers reached a final destination, which we have marked with a red pin.

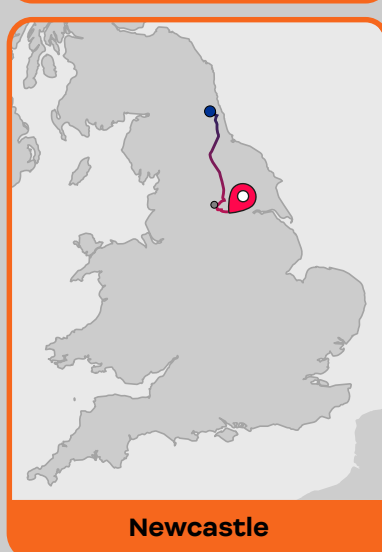
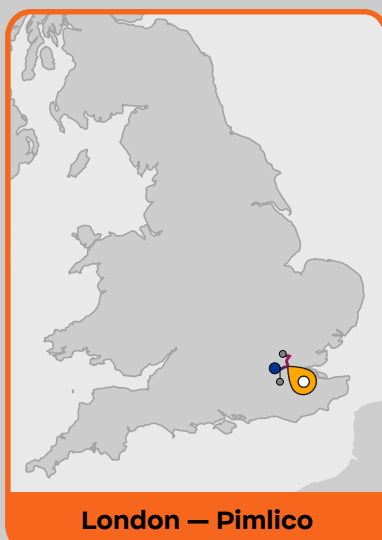
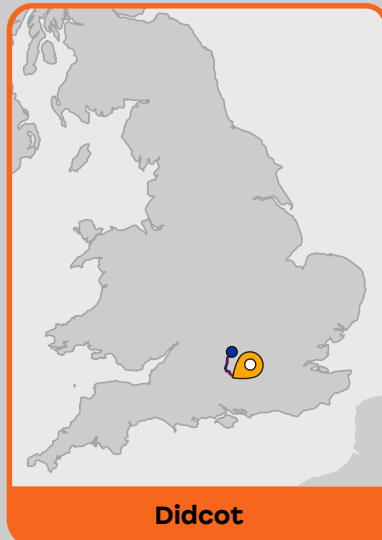


For those that didn't, we've marked their last known stop with a yellow pin.

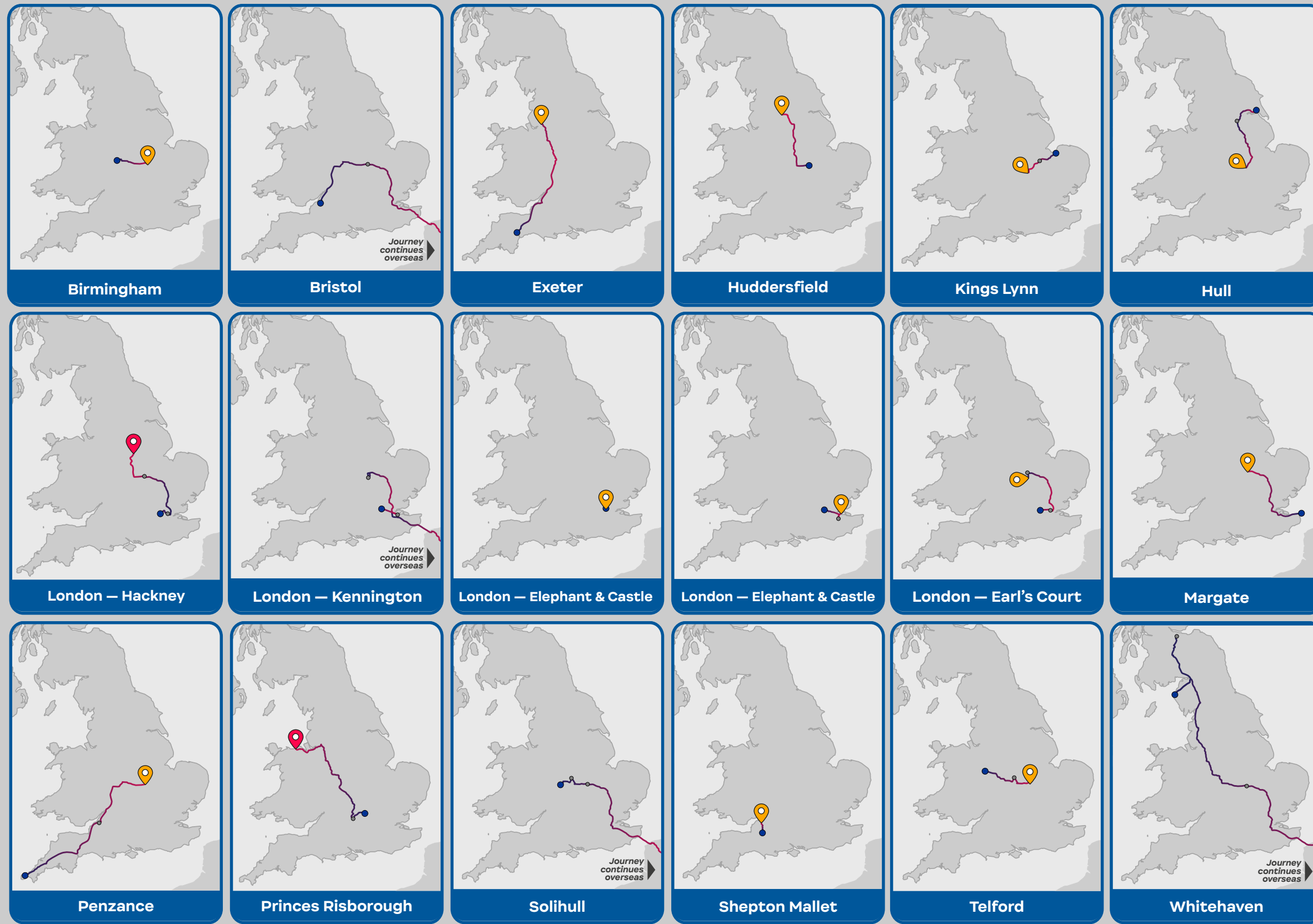
The maps here, and in the following spread, have been generated for illustrative purposes only and are designed to demonstrate the tracker routes taken within the UK after leaving the Sainsbury's and Tesco stores featured within our investigation.

Location markers





-  Final destination
-  Last known stop
-  Starting point
-  Stop-off point



**Figure 3:
TESCO
soft plastic
tracker
journeys**



Location markers

-  Final destination
-  Last known stop
-  Starting point
-  Stop-off point

Sainsbury's

A total of 22 trackers were dropped at front-of-store collection points in large Sainsbury's supermarkets across England, 11 of which reached a final destination. Unlike Tesco, none were sent to be downcycled – in fact, all 11 likely ended up being burned, either for energy recovery or as refuse derived fuel (RDF).

In response to Everyday Plastic and EIA, Sainsbury's responded that "Eurokey is Sainsbury's supplier for plastic sortation and recycling services."¹⁶⁷



Fuelling the fire

Six of the tracked bundles of soft plastic were sent to producers of fuel pellets in the UK. These producers shred, dry and compact the hard-to-recycle plastic waste and convert it into SRF (Solid Recovered Fuel) and RDF (Refuse Derived Fuel), which is then used in the production of energy for furnaces and kilns. This is not considered a form of recycling. Three of these bundles arrived at RDF facilities without pinging at an interim reprocessing waste facility.

As plastic is made from fossil fuels (oil or gas), it is highly calorific when burned, which is why SRF and RDF pellets are commonly used to power cement kilns.¹⁶⁸ It is not known whether the SRF or RDF pellets that were likely produced from the tracked bundles of soft plastic packaging were sold and burnt in cement kilns within the UK or abroad.



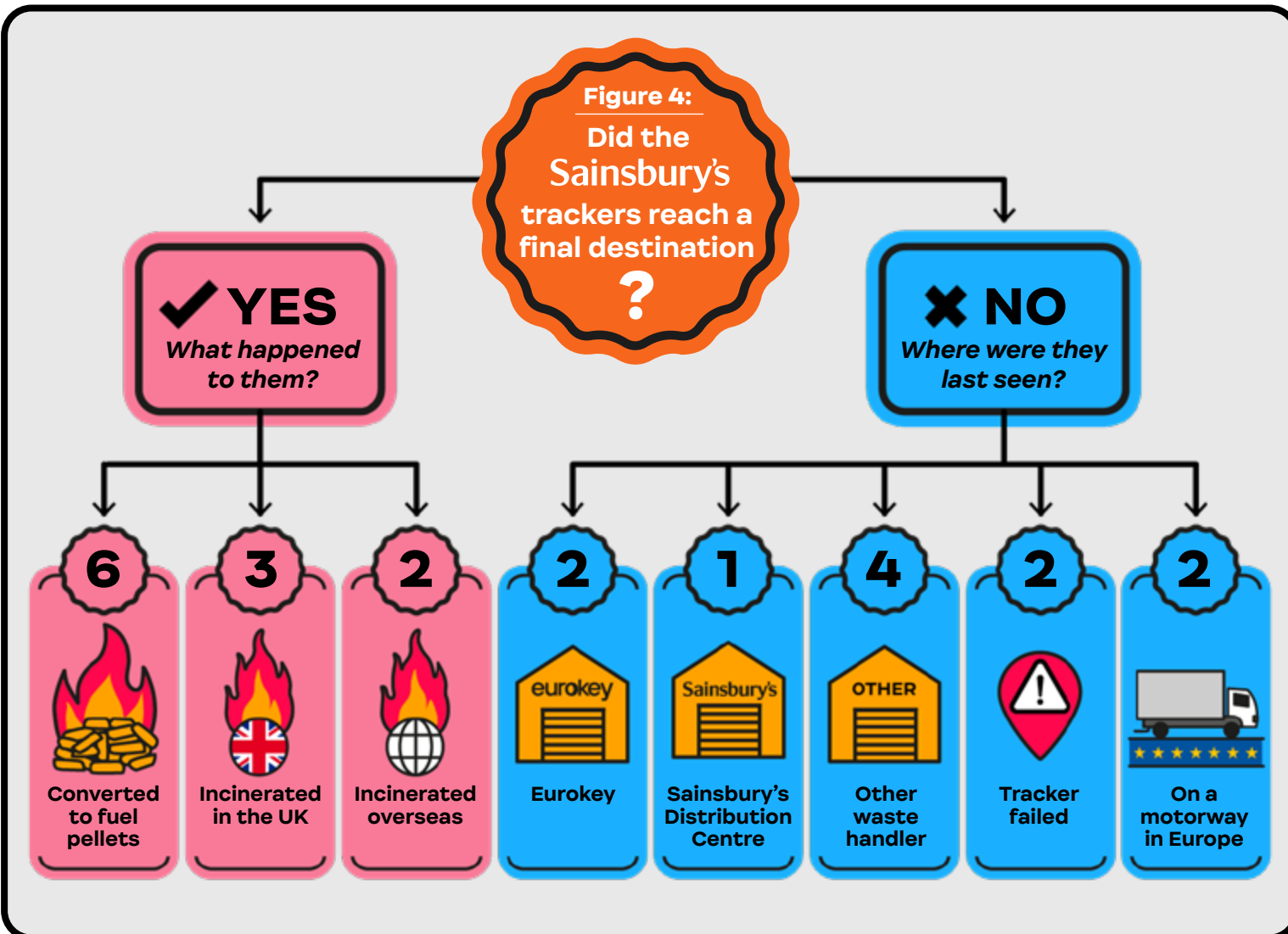
Incinerating soft plastic to recover energy

Five of the tracked bundles of soft plastic that were placed in front-of-store collection points at Sainsbury's were sent to incinerators for energy recovery – 3 to facilities in the UK, and 2 which travelled overseas to be burnt at facilities in the Netherlands and Sweden. This is not considered a form of recycling. All 5 of these bundles arrived at incineration for energy recovery facilities without pinging at an interim reprocessing waste facility.

Between the supermarket and the incinerator

Trackers placed in collection points at Sainsbury's stores in Margate (1) and Chester were last seen at waste transfer stations run by Biffa, whilst the tracked bundles of soft plastic dropped in Selly Oak, Birmingham and Dalston, London, travelled from Biffa waste transfer stations to incineration for energy recovery facilities in the UK and the Netherlands respectively. In response to Everyday Plastic and EIA, it was confirmed by Biffa that it is not directly contracted by Sainsbury's to handle soft plastic packaging waste from its take-back schemes.^{169a}

Biffa is transparent about the difficulty in recycling soft plastic, saying on their website that "flexible clear plastic, or plastic film, is one of the major sustainability challenges facing us as a society. It cannot currently be recycled at scale, it contaminates easily, and is a source of pollution [...] Wherever possible, we process these types of plastics to extract low-carbon energy."^{169b}



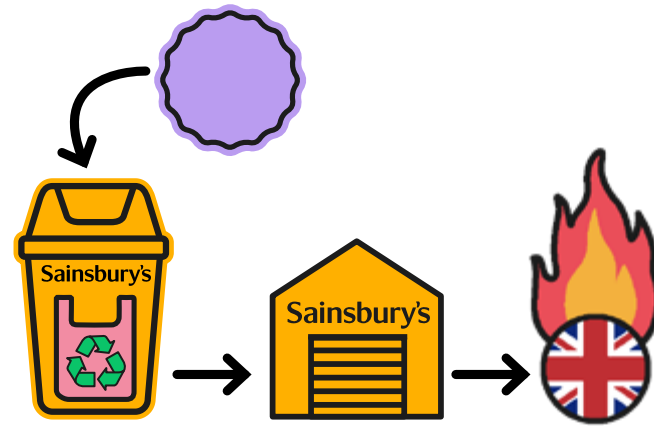
Three incinerator chimneys billowing fumes

A tracked soft plastic bundle dropped at Sainsbury's in Bristol pinged at a waste transfer station managed by Veolia – the largest waste management company in the world.¹⁷⁰ This was subsequently sent to a facility in Sweden to be incinerated for energy recovery.

This instance of export demonstrates a recent trend of UK plastic waste exports to Sweden. Data collated by the Basel Action Network has shown that prior to June 2023, the UK exported no plastic waste to Sweden. Between June 2023 and April 2024, Sweden received 44,000 tonnes of plastic waste from the UK.¹⁷¹ In response to Everyday Plastic and EIA, it was confirmed by Veolia that it is not directly contracted by Sainsbury's to handle soft plastic packaging waste from its take-back schemes.

In a recent Bloomberg article, Veolia says there is no end market for some plastics – carrier or salad bags and cling film – and so there are no facilities to recycle them. “If we invest in a facility, and the demand for that material is not consistent, it makes us very nervous to spend £40 million on a facility”, said Veolia's director of sustainable technology.¹⁷²

Two other trackers dropped at Sainsbury's stores were subsequently sent directly to UK incineration for energy recovery facilities without pinging at other interim waste company facilities. This includes the tracked soft plastic packaging bundle placed at Sainsbury's store in Elephant & Castle in London.



The tracker dropped at a Sainsbury's store in Newcastle travelled to a Sainsbury's distribution centre in Leeds, before heading directly to an incinerator for energy recovery in the UK, meaning the waste was collected by Eurokey – Sainsbury's contracted waste management company – before being transported straight to an incineration facility.

Sainsbury's said: “Right now, the volume we collect overall is relatively small, so to help and encourage more customers to recycle their flexible plastics in our stores, we recently improved our signage. This now includes more information about which items are accepted and the condition they should ideally be in to allow us to recycle them (i.e. clean and free of food). This will also help to improve how Eurokey sorts the plastic it collects from our stores, which in turn **should result in a smaller percentage of materials being incinerated for energy.** Of the flexible plastic we collect in-store, the majority of it is in good condition and so is recycled. However, when materials are soiled or damaged, then they may need to be converted for energy.”

Final destination: unknown

The remaining 11 trackers in soft plastic bundles did not ping at any final treatment destinations. In addition to the 3 that were last seen at waste transfer stations, 2 never left the supermarket (Finsbury Park and South Kensington, both in London), 1 stopped pinging at a Sainsbury's distribution centre and 3 were last seen at Eurokey's reprocessing facility in the UK (more information on this company below) (Margate 2, Angel in London and Shirley in Birmingham). Two other trackers (Penzance and Marshall Lake in Birmingham) left

Eurokey and headed to two different UK ports respectively. The Penzance tracker was last seen on a motorway in Germany, whilst the Marshall Lake tracker last pinged on an A-road in Belgium. The tracker dropped in the Brighton store was last seen at another waste handler (not named within this report).

When asked how much of the collected soft plastic packaging from Sainsbury's take-back schemes is recycled (including downcycled) in the UK, recovered in the UK and exported for recycling or recovery, Sainsbury's did not provide a response.



An aerial view of a plastic processing facility, showing huge mounds of plastic

Tesco

Eighteen trackers were dropped in collection points at the front of Tesco stores across England. The results are somewhat less clear than Sainsbury's, with only 6 reaching a final destination, 5 of which ended up in recycling facilities where the bundles were likely being downcycled.¹⁷³

In response to Everyday Plastic and EIA, Tesco stated that "The only third-parties that are approved by Tesco to sort and process plastic waste are Eurokey and Veolia". This was also corroborated by Veolia in response to Everyday Plastic and EIA.¹⁷⁴



Downcycling is not recycling

Of the 6 trackers that reached a final destination, 5 were sent to facilities that recycle plastic waste into other products such as carrier bags, bin bags or composite timber boards. As explained above, this is commonly known as downcycling – the process of turning waste into lower value products (i.e. not recycled back into the original product and products that are in turn difficult to recycle or disposed of after use).

Soft plastic packaging waste that is mechanically recycled cannot be turned back into new food-grade packaging in the UK.¹⁷⁵ We believe that none of our tracked bundles of soft plastic whose final destination is known, ended up at a closed-loop recycling facility. However, the PRN system does allow for some downcycling facilities to sell PRNs, which supermarkets can then count towards their mandated packaging recycling targets.

The remaining tracker (that was placed in the collection point at the front of the store in Hackney, London) was sent to a producer of fuel pellets in the UK.

bundle of soft plastic placed in a store in Princes Risborough was the only one to remain in the UK, ending up at a recycling facility in the UK that does not appear to produce plastic packaging but rather other plastic products.

Final destination: unknown

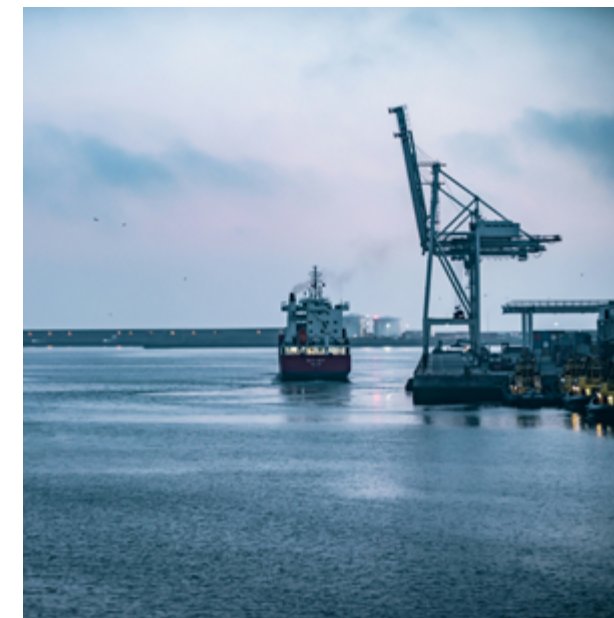
With only 6 of the Tesco trackers reaching final destinations, what happened to the other 12? Six trackers were last seen at Eurokey's reprocessing facility in the UK. The Shepton Mallet tracker left the store and never pinged again after sitting in a Tesco distribution centre in Bristol. One tracked bundle of soft plastic left a store in Exeter and travelled to the same waste handler as the tracker from the Sainsbury's store in Brighton.

Two trackers placed in Tesco stores in Earl's Court in London and King's Lynn travelled from the supermarkets to Eurokey, which then sent them onward to a waste handler elsewhere in the UK. This facility also handled the soft plastic that was placed in the Tesco store in Kennington, which was subsequently shipped to a recycling facility in Türkiye.

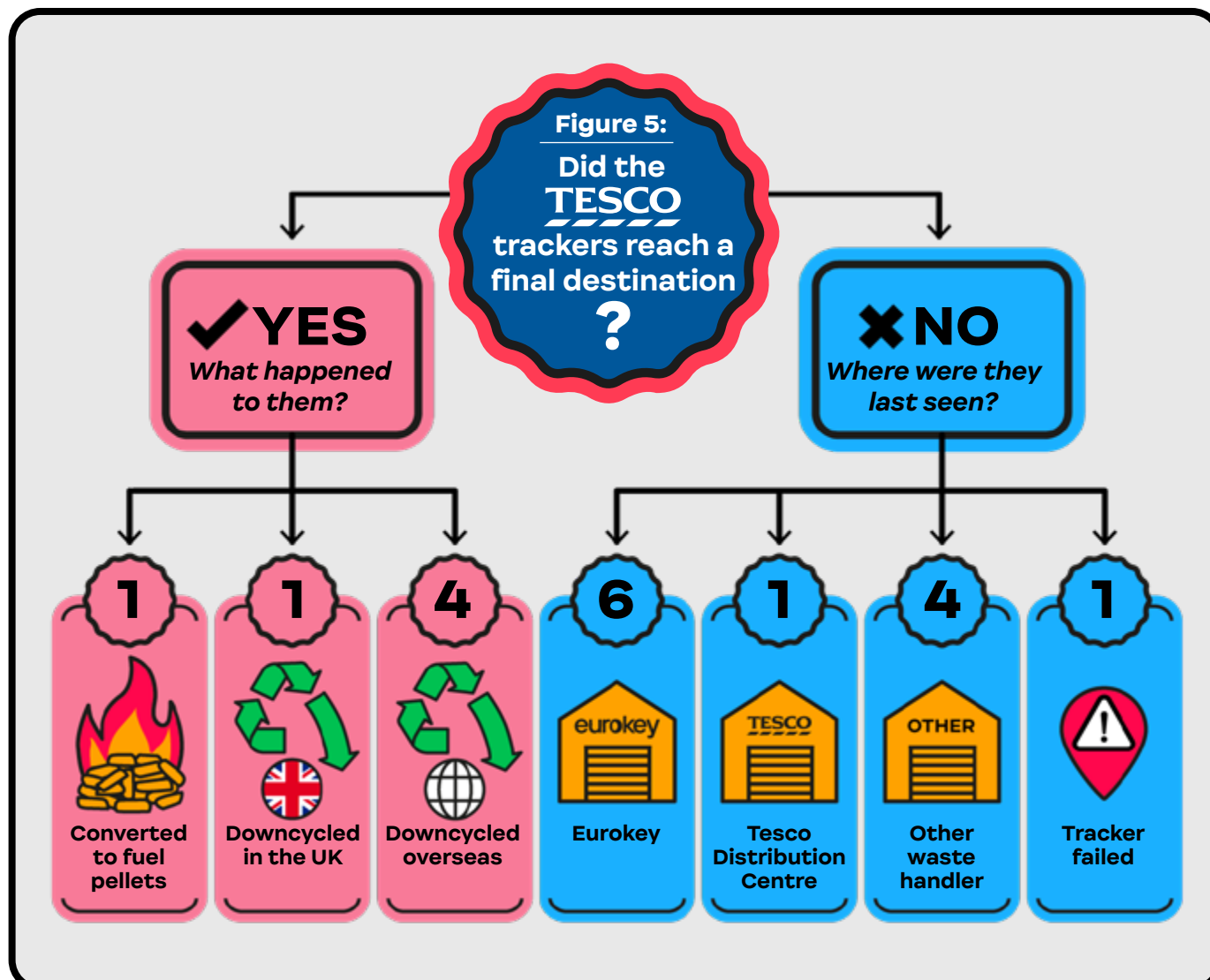
The tracker placed in the collection point at the front of the store in the supermarket on the Old Kent Road in London failed, having never left the supermarket. Another tracker, placed at the same store did manage to survive once it left the store, stopping off at a courier warehouse before heading to a Veolia commercial waste depot in the UK, where it was last seen.

Reliance on export

Of the 5 trackers that were sent to recycling facilities where they were likely to be downcycled, 4 (Bristol, Kennington in London, Solihull and Whitehaven) were exported, including 3 to recycling facilities in Türkiye, with the other heading to a recycling facility in Germany. The tracked



A shipping port, featuring a ship and a crane



Eurokey: a key player

Of the 40 trackers that were deployed over the course of the investigation, half (20 trackers) pinged at and thus were handled by Eurokey. Eurokey is a waste and resource management company and has contracts with both Sainsbury's and Tesco to handle collected soft plastic packaging waste from their take-back schemes.¹⁷⁶ In the past, it was reported that collected soft plastic packaging waste was sent to its Polish facility for reprocessing (sorting) prior to further export for final treatment (including recycling).¹⁷⁷ However, in 2022, Eurokey opened a UK reprocessing facility to sort plastic waste for its UK customers.¹⁷⁸

Following the Bloomberg investigation, which revealed that soft plastic handled by Eurokey in their Polish facility had ended up at an industrial estate in Türkiye, Tesco launched an enquiry into its relationship with the company.^{179 180} In addition, it was found that Eurokey had its accreditation as an exporter temporarily suspended in 2021 by the Environment Agency after breaching regulations.¹⁸¹

When Everyday Plastic and EIA put the results of the tracker investigation to Eurokey, it stated that *"We do not send any material to landfill and only a very small percentage of the material is determined to be non-recyclable and goes to waste-to-energy."*

Figure 6:
Outcomes of trackers that reached a final destination



Soft plastic packaging waste exports

EIA also reviewed Everyday Plastic's tracker data for collected soft plastic packaging waste that was shown to be exported to see if we could get a better understanding of potential ramifications and whether the exported waste could be counted towards recycling obligations. For more information on the methodology and assumptions made, please refer to Appendix 5.

The UK is a significant plastic waste exporter, historically, being the 4th largest global exporter of plastic waste.¹⁸² In 2023, the UK exported 568,000 tonnes per year, exporting primarily to Türkiye, the Netherlands, Vietnam and Poland.



Notably, exports to Poland have significantly decreased in 2023 from 2022 – which could be linked to recent investigations into stopping illegal waste shipments misdeclared as plastic waste.¹⁸³ The largest current recipient of UK plastic waste is Türkiye, receiving approximately 25% of all exports.¹⁸⁴

Part of this waste export stream includes plastic packaging, as the

UK also relies on exporting its plastic packaging waste to meet recycling targets. By way of example, of the attainment of a 55% plastic packaging recycling rate (not including soft plastic packaging) stated by the WRAP UK Plastic Pact report in 2022–2023, they state this was achieved by exporting the equivalent of 46% abroad for recycling.¹⁸⁵

UK plastic waste is exported due to longstanding high levels of UK plastic waste production, underinvestment in adequate domestic recycling infrastructure and historic requirements that imposed fewer quality control obligations for exported waste – factors that combined to make exports an economically convenient choice.¹⁸⁶ However, the export of plastic waste generally, particularly from high-income countries, causes environmental and human health harm. This is exacerbated by the export of hard-to-recycle plastic, widespread illegality and the displacement of recycling capacity for domestically generated plastic waste in recipient countries. There is a growing consensus that UK plastic waste exports need to be banned.¹⁸⁷

Defra deems soft plastic packaging hard-to-recycle and of poorer quality but still allows its recycling, including that which is exported, to count towards recycling targets.¹⁸⁸

Yet, the export of soft plastic packaging waste collected has not been without issues, and these concerns have been raised in the past.¹⁸⁹ Despite this, Everyday Plastic's trackers indicate that Sainsbury's and Tesco continue to export some of their collected soft plastic packaging waste.

The journeys of the trackers that were exported, as summarised in Figures 4 and 5 of this report, help us consider the following potential ramifications:

Trackers exported from Sainsbury's suggest that collected soft plastic packaging waste is also likely being exported to be incinerated for energy generation (recovery), rather than being recycled.

The incineration of collected hard-to-recycle plastic not only perpetuates its impact, as it produces more greenhouse gas (GHG) emissions than other incinerated waste streams, but also justifies increased incineration capacity by further establishing a market for it abroad or in the UK.

Whilst 2 of the 4 Sainsbury's exported tracker destinations were unknown, the other 2 tracker journeys indicate that Sainsbury's collected soft plastic packaging was incinerated for energy recovery in Sweden, and potentially incinerated for energy recovery in the Netherlands. The export of UK plastic waste destined for recovery cannot

be counted as recycled. This instance of export helps demonstrate a recent trend of UK plastic waste exports to Sweden. Data collated by the Basel Action Network has demonstrated that prior to June 2023, the UK exported no plastic waste to Sweden. As of June 2023, it commenced export (peaking in June, September, December 2023 and February 2024 with over 6 million kg/month). In April 2024 3.2 million kg/month was exported.¹⁹⁰

Plastic is derived from fossil fuels, and thus the GHG emissions from its incineration are higher compared to those from other waste streams.¹⁹¹ A 2022 Defra and Government Statistical Services report stated that treating plastic film (i.e. soft plastics) by energy from waste also releases 1,475 kg CO₂e / tonne more into the atmosphere relative to using virgin materials or fuels.¹⁹² This high level of CO₂e release is also the case for other plastic types, compared to the burning of food, garden, cardboard and paper waste – whose incineration, Defra found, results in a net carbon equivalent saving from that process compared to the use of virgin material or fuel.¹⁹³ In short, the above does not seek to justify incineration for energy generation of other waste streams, but rather to highlight that burning plastic – especially soft plastic already separated from residual waste – is even more problematic.¹⁹⁴

Sending already separated collected soft plastic packaging waste (from residual waste) abroad for incineration for energy recovery is

likely creating a market for this trade route while also contributing to the GHG emissions of another country. Conversely, retaining this collected soft plastic packaging waste in the UK for recovery would also do the same domestically.

In 2020, the NGO UKWIN stated that existing English energy-from-waste capacity already exceeded the quantity of genuinely residual combustible waste¹⁹⁵ and under business-as-usual this overcapacity is set to increase further.¹⁹⁶ New incinerators need to be fed waste to turn a profit. Without a moratorium on new incineration capacity, England would be at risk of missing its legally binding commitment to halve the amount of residual waste (including plastic) going to incineration or to landfill by 2042.¹⁹⁷

What this all seeks to demonstrate is that the use and subsequent incineration for energy recovery of already separated, collected soft plastic packaging waste, whether within the UK or abroad, only serves to exacerbate the impact of this waste stream.

These 2 trackers identified two UK waste companies as the last known UK interim facility destinations for bundled soft plastic packaging waste that was exported to facilities that incinerate waste for energy recovery and were thus assumed to be the exporters. It is important to note that neither of these companies are directly contracted by Sainsbury's to handle their collected soft plastic packaging waste. These companies – Veolia and Biffa – have issued

statements in the past supporting a ban on these types of plastic waste exports.¹⁹⁸

Trackers infer that Tesco collected soft plastic packaging waste is often exported for recycling.

According to tracker findings, it seems that Tesco is currently relying more on exports than on UK facilities to recycle its collected soft plastic packaging waste. Of the 5 Tesco soft plastic waste bundles whose final destination was a recycling facility only 1 tracker pinged at a UK recycling facility compared to the 4 trackers pinged at recycling facilities abroad (1 in Germany, the remaining 3 in Türkiye).¹⁹⁹

The majority of trackers exported from Tesco pinged at recycling facilities in Türkiye, a country whose import of plastic waste (including that from the UK) has been clearly demonstrated to cause environmental and human health harm.

Whilst recycling is higher in the waste hierarchy than recovery, exporting plastic waste abroad for recycling is not without ramifications. This is especially true for exports to non-OECD countries and OECD countries where issues related to plastic waste imports have been well-established – like Türkiye. Three of the four Tesco-exported trackers pinged at recycling facilities in Türkiye.



There have been several publications in recent years specifically detailing the issues of plastic waste exports to Türkiye. These include BBC and Greenpeace investigations finding UK plastic packaging waste dumped in the Adana region,²⁰⁰ how these Turkish plastic dumpsites are found to be highly contaminated with toxic chemicals,²⁰¹ and how plastic waste exports are

even causing widespread plastic marine pollution in the surrounding Mediterranean Sea.²⁰²

In addition, Human Rights Watch in 2022 found serious health impacts from plastic recycling in Türkiye, with air pollutants and toxins emitted affecting workers, including children, and people living near the recycling facilities in question.²⁰³

In May 2021, the Turkish government banned the import of polyethylene plastics (i.e. PET, HDPE and LDPE), which at the time constituted the majority of plastic waste polymers exported to Türkiye from the UK.²⁰⁴ Shortly after, in July 2021, the Turkish government repealed the ban, reclassifying polyethylene plastics for import, albeit under stricter controls and enhanced monitoring systems.²⁰⁵ Similarly, in the following years, Türkiye clarified and eased restrictions on the import of other polymers, including polystyrene, polyvinyl chloride and polypropylene.²⁰⁶ In 2022, WRAP stated that “[Türkiye] remains the largest export location for UK plastics waste despite the implementation of a ban on the import of polyethylene (PE) plastics of commodity code 39 15 10 on 18th May 2021”.²⁰⁷ As of December 2023, the latest details of Turkish plastic waste import restrictions stipulate that unless otherwise stated, and amongst other requirements, plastic waste imports – other than code B3011 (plastic waste separated by polymer that is destined for recycling in an environmentally sound manner and almost free from contamination and other types of wastes, mixtures of plastic wastes consisting of polyethylene (PE), polypropylene (PP) or polyethylene terephthalate (PET) provided they are destined for separate recycling of each material and in an environmentally sound manner, and almost free from contamination and other types of wastes)²⁰⁸ are prohibited. Additionally, these regulations limit contamination levels for imported plastic waste to

1%. However, according to Turkish sources, this 1% contamination threshold is interpreted as a measure of “recyclability”, which may be subject to varying interpretations rather than a strict contamination limit. In addition, the European Waste Catalogue code 15 01 02–Plastic packaging, which can fall under the B3011 classification, is conditionally allowed for import into Türkiye, provided the source and quality of the material are traceable and verifiable.²⁰⁹ It is EIA’s understanding that Tesco accepts all types of soft plastic packaging (of all polymer types and potentially containing food residue and other contaminants).²¹⁰ Therefore, adequate sorting and decontamination would be necessary prior to export to Türkiye to comply with current Turkish plastic waste import requirements.²¹¹

Other countries that export significant amounts of plastic waste to Türkiye are also taking action. The 2024 adoption of the newly revised EU Waste Shipment Regulation now allows for the suspension of EU waste exports to OECD countries if specific obligations are not met. This regulation places particular scrutiny on the export of plastic waste.²¹²

Increased import and export restrictions alone, however, do not necessarily address the issues cited. Additionally, the impact of continued plastic waste exports to Türkiye is also exacerbated by these shipments taking up Turkish recycling capacity, resulting in less capacity to recycle domestically generated plastic waste²¹³ and continued instances of

illegal waste exports through legal channels by being misdeclared as recyclable plastic waste.²¹⁴ In 2022, according to local media, Turkish journalists who were investigating European plastic waste exports to Adana, Türkiye, were beaten and had their equipment confiscated by Turkish plastic recycling company staff.²¹⁵

In response to our findings that tracked soft plastic packaging waste bundles from Tesco collection points were exported to recycling facilities abroad, Tesco stated that *“We do not want packaging materials going to landfill or the environment. To mitigate against this, we have elected to export some of our soft plastic packaging outside of the UK. Like others across the industry, we rely on our international suppliers to support our 4Rs strategy given the limitations on the current capability of the UK’s recycling sector. The export of plastic waste is subject to licences issued by the UK government to waste processors including Tesco’s suppliers. **Tesco waste is exported to Germany because this is where our bags for life are manufactured from recycled materials. We do not permit our soft plastics packaging to be exported to Turkey and we have monitoring in place, including audits, to verify that our waste partners are acting in accordance with our requirements. We are investigating your claims with the supplier.**”*

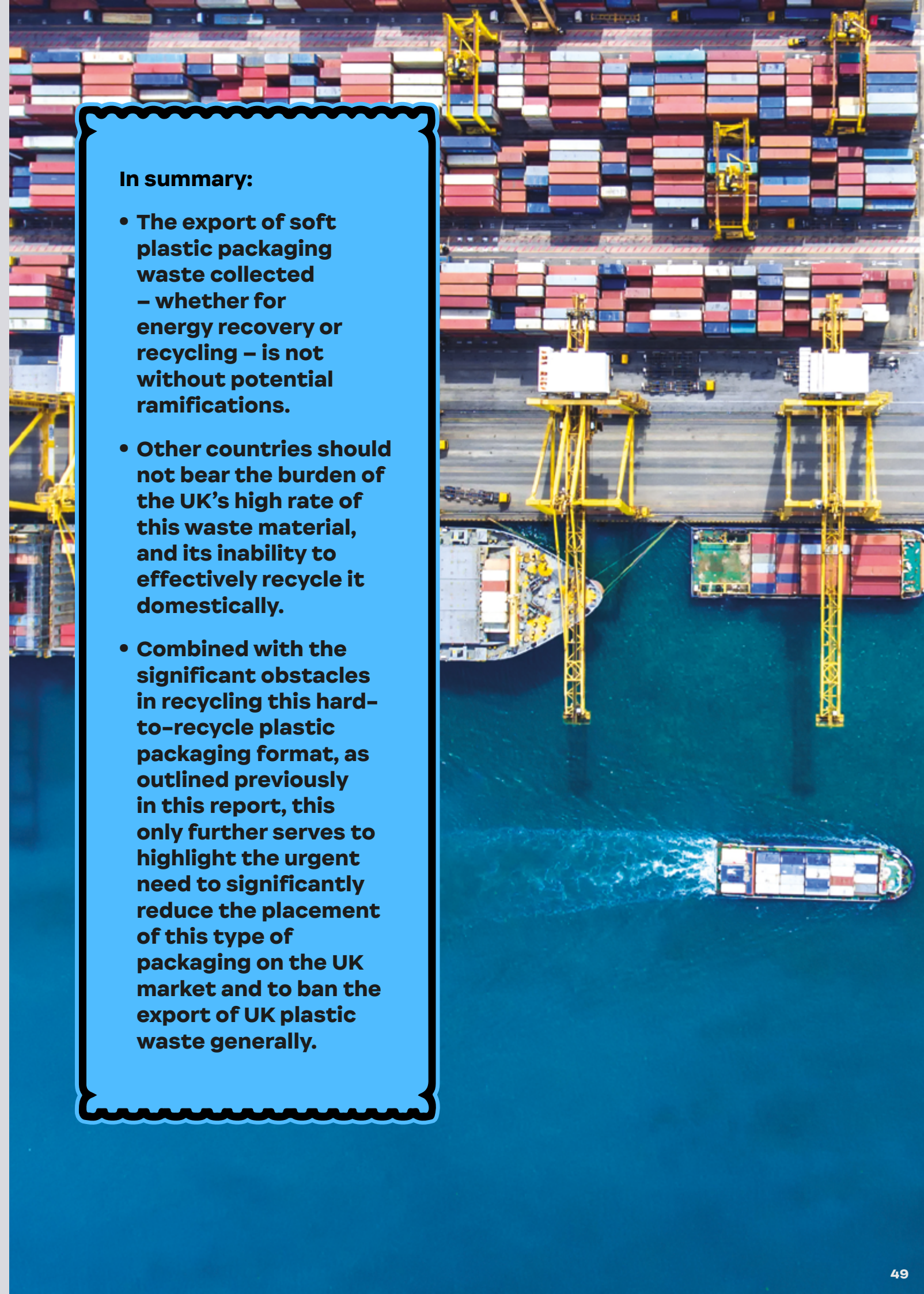
These trackers identified two UK waste companies, one of which was Eurokey,216 as the last known interim UK waste facility destination for tracked bundled soft plastic packaging waste that was exported to recycling facilities. The trackers indicate that soft plastic packaging waste bundles from both companies were then sent to recycling facilities in Türkiye, and given current Turkish plastic waste import restrictions, would have had to be effectively sorted and decontaminated prior to export.

Eurokey holds the relevant permits required to sell plastic credits (PERNs) for the export of plastic packaging waste that it exports to be recycled abroad.²¹⁷

In response to Everyday Plastic and EIA findings from tracker pings, Eurokey stated that *“only a very small percentage of the material we handle is deemed to be non-recyclable, and as the UK currently lacks the infrastructure to recycle all the plastic material, some material must be transported to reprocessors in other regions.”* and that *“[Eurokey] ha[s] built strong relationships with accredited reprocessing facilities, all of whom are approved by the UK Environment Agency.”*

In summary:

- **The export of soft plastic packaging waste collected – whether for energy recovery or recycling – is not without potential ramifications.**
- **Other countries should not bear the burden of the UK’s high rate of this waste material, and its inability to effectively recycle it domestically.**
- **Combined with the significant obstacles in recycling this hard-to-recycle plastic packaging format, as outlined previously in this report, this only further serves to highlight the urgent need to significantly reduce the placement of this type of packaging on the UK market and to ban the export of UK plastic waste generally.**





Conclusion: why do take-back schemes exist?

Supermarkets are not doing enough to lead or pioneer game-changing initiatives to significantly eliminate packaging through genuine solutions, such as reuse and refill. New policy and legislation could level the playing field and drive greater collaboration; however, supermarkets are not pushing hard enough for government intervention.

Data shows an increased level of soft plastic packaging on UK shelves. Take-back schemes and on-pack labelling are enabling supermarkets and brands to state that soft plastic packaging is recyclable. The creation of supermarket soft plastic take-back schemes has also been supported by industry stakeholders, with hopes that they will ensure greater security in the supply of soft plastic packaging waste, with the aim of developing and building recycling end markets, ahead of the mandated roll-out of soft plastic kerbside collections in the UK in 2027.^{218 219 220}

Whilst the move to kerbside collection will most likely increase the quantity of soft plastic being collected and thus has the potential to stimulate the market, this report

calls into question the extent to which the collected material can be recycled and is currently being recycled, particularly within the UK.

Across the industry, it is acknowledged that soft plastic is hard-to-recycle. The results from the tracker investigation further indicate that those challenges are still present through a series of real-time scenarios. Despite Sainsbury's and Tesco stating that customers can return their soft plastic to store for recycling, and therefore inferring that it will be recycled, none of the Sainsbury's soft plastic packaging bundles we tracked, whose final destination we determined through this investigation, went to a recycling facility either in the UK or abroad, with 50% of trackers ending up being

turned into refuse-derived fuel or incinerated for energy recovery. The results from Tesco are equally revealing. Of the final destinations we were able to determine, only 1 of our tracking devices was sent to a UK recycling facility – to be downcycled into products other than packaging – with 4 being exported to recycling facilities and 1 tracked bundle going to a facility that produces refuse-derived fuel.

Soft plastic take-back schemes are presented to citizens as a solution to the continued and increased use of soft plastic packaging. However, there are many issues with these schemes, including the complexity of polymers, the presence of organic residue and multi-material packaging, along with the lack of UK recycling capacity and potential ramifications if the waste is exported.

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

According to our estimates, total UK soft plastic recycling capacity would need to increase by approximately

↑ 350%²²¹ ↑

to meet the demand based on the amount of soft plastic currently estimated to be placed on the market in the UK.

There is strong evidence to suggest that the recyclate from this waste stream, having undergone mechanical recycling for the most part, is often downcycled into other, lower-grade products with significantly diminished recyclability, thereby delaying, but not avoiding, final disposal. Whilst some stakeholders pin their hopes on the future development of chemical recycling technologies, there are open questions regarding whether this highly polluting process should be defined as a 'recycling' technology.



The key takeaways

Customers are being misled

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

- Soft plastic packaging labels feature circular loop symbols and green imagery, in-store signs state “recycle your soft plastic here” and supermarket websites inform consumers that soft plastic is recyclable and will be recycled.
- Consumer research detailed in the ClientEarth briefing demonstrates that the average consumer will understand recycling to mean that, if the packaging is disposed of correctly, (1) it will be recycled, and (2) recycling will adequately mitigate the environmental impact of plastic packaging. ClientEarth argues that it is well-established that the environmental impact of a product, including its recyclability, is likely to impact consumer decision-making.

- ClientEarth argues that, in light of the investigation revealing that 70% of soft plastic that reached a known destination is burnt, not recycled, there is strong evidence that soft plastic recycling claims are misleading consumers. It argues that in their overall impression, soft plastic recycling claims are likely to deceive the average consumer about the main characteristics of the product (its recyclability and environmental impact), and this misleading information is likely to cause the average citizen to make a decision they would not have made otherwise.
- These claims also undermine the established concept of the waste hierarchy, which makes clear energy recovery is inferior to recycling.

In light of the investigation, ClientEarth states that companies making these claims may be breaching consumer protection law and calls on the UK CMA to

intervene. Supermarkets must substantiate the claims made about soft plastic recycling and cease making these claims if they cannot provide evidence based on real-world conditions.

More generally, ClientEarth also argues that all plastic recycling claims, including standardised labels which give an impression of closed-loop circularity and environmental neutrality, carry the potential to mislead consumers about the true environmental impact of plastic packaging. Recycling is not a solution to the plastic waste crisis and consumers must not be misled about that reality.

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.

This report has evidenced that customers’ goodwill may be taken advantage of. Our tracker investigation indicates that a significant amount of collected soft plastic packaging may still not be recycled or is potentially exported – an action not without potential ramifications. The tracker results showed what is already well recognised – that it is challenging to recycle post-consumer soft plastic packaging and there is currently a reliance on incineration for energy recovery, SRF/RDF production and exports for treating this waste stream. In addition, soft plastic

packaging recycling may very often actually be downcycling, which is different from the outcome of other typically and widely recycled waste materials such as glass and cans.

The major shortfall in soft plastic packaging recycling capacity in the UK is a challenge acknowledged by industry stakeholders. The uncertainty surrounding the technical and economic viability of chemical recycling, along with clear environmental concerns, is another significant issue. The industry’s justification for the schemes is to enable reprocessing infrastructure and develop the end markets required; however, this suggests that effectively managing soft plastic as a material is still in its very early stages. Growing evidence suggests it may never be fully viable. Regardless, the take-back schemes are being simply presented to customers as a potential solution. However, they lack the level of transparency regarding the developmental nature of the process, the market, and what happens to the soft plastic packaging waste collected through the schemes.

Take-back schemes may be obstructing genuine solutions

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 to increasing the use of this waste material based on a hypothetical, and problematic, future recycling solution.

It's well understood that whether a piece of packaging is labelled as recyclable and can be returned for recycling in-store impacts the customer's choice. This is further evidenced by our poll in which at least 40% of respondents stated that they look for packaging that is labelled as recyclable and/or recycled, when choosing which products to buy. We have some understanding around the significant level of effort required to shift citizen behaviour, yet when given an option to help address the problem of plastic (like take-back schemes) customers make the effort to help.

WRAP set out the need to 'inspire citizens and drive demand' when discussing the shift away from packaged fruit and vegetables.²²²

In a scenario where elimination of packaging had taken even more of a priority, and extensive reuse and refill initiatives were widely adopted, there would certainly still be a need to develop viable solutions for the remaining unavoidable soft plastic packaging.²²³ But this has not yet been proven to be the case. Lightweighting, amongst other things, has resulted in a move towards *more* soft plastic packaging being placed on the UK market. The collection points are part of a system that means we're seeing a growing dependency on soft plastic packaging despite the challenges of using this type of packaging.

The presentation of the take-back schemes as a solution could even be argued as being a distraction. The focus on soft plastic packaging recycling is pushing focus away from transitioning to alternatives at the top of the waste hierarchy (like increased reduction and reuse) towards an investment in downstream waste management instead. There is a need for customers to understand the issues with soft plastic packaging in order to help them decide whether they would instead prefer to invest their time and money in alternative solutions, such as choosing loose fruit and vegetables, using refill schemes, or buying in bulk to reduce packaging waste.

Research has shown people can produce more waste when they think it will be recycled.²²⁴ 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. With this insight, and given the opportunity to use accessible and affordable reuse and refill systems, citizens may

be more likely to adapt to how their products are sold than supermarkets believe. Take-back schemes, albeit temporary measures ahead of kerbside collections, detract from this becoming a reality.

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**".²²⁵ This report is intended to do just that.



Soft plastic packaging from fruit, vegetables, salad and herbs, laid flat on concrete floor © Everyday Plastic



Recommendations

The public deserves transparency and should have sufficient information to understand soft plastic take-back schemes for what they are, in addition to having their concerns about plastic pollution effectively addressed.

We want to ensure the need for plastic packaging reduction is not undermined, and that others do not bear the brunt of the UK's soft plastic packaging problem.

To date, a number of different policies that relate to plastic and plastic packaging are in place or set to come into force in the UK – quite often being delayed or weakened. What this report serves to demonstrate is that the current framework of different policy requirements is resulting in industry solutions that don't necessarily address the fundamental issues of high levels of plastic packaging use as well as genuine and current recyclability and recycling.

The UK government has the opportunity to remedy this. Under the newly elected Labour government, moving Britain to a zero waste economy is one of Defra's five core

priorities.²²⁶ The fifth and final INC meeting for the Global Plastics Treaty will take place in South Korea at the end of 2024. Under this new leadership, and as a member of the so-called 'High Ambition Coalition', the UK has committed to a "call for binding provisions to restrain and reduce the production and consumption of primary plastic polymers to sustainable levels" which crucially includes a legally-binding target to cut global plastic production.²²⁷ As such:

In order to level the playing field we are asking Sainsbury's and Tesco to publicly advocate for ambitious government policy and to actively push for the UK government to support a strong legally-binding target to cut global plastic production by 40% by 2040 at the Global Plastic Treaty negotiations and beyond.

We are also calling on supermarkets to:

- **Significantly reduce single-use non-essential plastic packaging use, including soft plastic packaging**
Continue to invest in and achieve elimination, reduction, reuse and refill voluntary targets but not by increasing the amount of single-use soft plastic packaging that is being used (i.e. lightweighting) or simply substituting it with another material.
- **Stop exporting collected soft plastic packaging waste**
Exporting this waste stream, for either incineration for energy recovery or recycling, is not without potential ramifications on recipient countries – especially given it is hard-to-recycle.
- **Be transparent**
Until kerbside collections are fully in place, to be more transparent and open with customers around the challenges presented by soft plastic packaging, including communicating how much and where soft plastic packaging collected is being recycled.²²⁸

We're calling for the UK government to support a cut in global plastic production by 40% by 2040. And we want Sainsbury's and Tesco to publicly support this.

As part of this investigation, we're asking the public to:

- **Sign our petition to push the supermarkets to take this action**²²⁹
Citizens have the power to drive change through using the strength of collective action – much like the efforts they are making to bring back soft plastic packaging waste to supermarkets.

In addition to being bold and ambitious at the Global Plastic Treaty negotiations to support a legally-binding target to cut global plastic production, we are also asking the UK government to urgently set the following targets:

Cutting plastic production through elimination

- **Set legally binding targets to reduce single-use plastic packaging by weight and unit by 2030**

For many years NGOs have been advocating for binding government targets.²³⁰ We are strongly urging the UK Government to put in place such a target – including building in short term milestones and mapping out long-term plans for cutting single-use plastic.

- **Remove plastic packaging from unprocessed fruit and vegetables by 2030**

To align with WRAP's recommendations by building in short term milestones and mapping out long-term plans. As a reference, France introduced a ban and restrictions of fruit and vegetable plastic packaging in 2022.²³¹

Cutting plastic production through reuse and refill

- **Set legally binding reuse and refill targets by 2030**

NGOs have concurrently been advocating for reuse targets to complement a reduction target. This should begin with prioritisation of high impact product categories that represent the biggest environmental and economic benefit for a quick transition to reuse and refill through:²³²

- **Providing financial incentives in the adoption of reuse systems**

Prioritising investments and incentives to help the sector shift to reuse.

- **Ensuring that UK Extended Producer Responsibility (EPR) for packaging legislation incentivises reuse over recycling**

This includes the use of modulated fees and allocating EPR revenue for reuse.²³³

Responsible management of plastic packaging

- **Ban all exports of UK plastic waste by 2027**

We strongly support the ever growing consensus for the UK to ban all of its plastic waste exports, including the EFRA Committee's call for all UK plastic waste exports to be banned by 2027.²³⁴

- **Introduce an immediate moratorium on new incineration and energy-from-waste capacity across the UK²³⁵**

Including the immediate revocation of the temporary ban that was lifted in England in May 2024.²³⁶

- **Prevent the uptake of chemical recycling as a treatment option for plastic, including packaging**

This includes rejecting calls to include chemical recycling and adoption of the mass balance approach in the UK plastic packaging tax.²³⁷

Recycling claims have come to misrepresent what is a limited and incomplete fix for the environmental impact of plastic 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 flexible 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. We support ClientEarth's suggestion that this guidance could take inspiration from the Design for Recycling criteria to be implemented under the PPWR, which also requires consideration of the environmental impact of available recycling technologies.



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