

Executive Summary

The Great UK Soft Plastics Scandal

June 2022

Introduction

Soft plastics (also referred to as flexible plastics or plastic films) are one of the hidden faces of the steadily worsening global plastics crisis.

This plastic packaging, which includes products such as fruit punnets, yoghurt pot lids, ready meals, wrappers, bags (such as shopping bags or those for products such as salad and pasta) and crisp packets, are used generally for mere minutes, but their impacts last far beyond.

In 2020, 92 per cent of plastic film (soft plastic) placed on the market in the UK was not recycled and of the 828,000 tonnes of plastics not collected for recycling, 38 per cent was plastic film. Whether disposed of or rejected at recycling facilities that cannot recycle them, these soft plastics are likely dumped in landfills or incinerated.

Soft plastics are difficult, if not impossible, to recycle. In the UK there is a current lack of kerbside collection or recycling infrastructure for this type of plastic, ultimately meaning that after use the majority of these materials are simply disposed of – the very definition of a single-use and linear economy that doesn't value resources.

To combat this challenge, UK supermarkets and brands, the primary producers of soft plastic packaging, are finding new ways to deal with this problematic waste stream. The solutions these companies are seeking are part of a bid to meet voluntary targets under the UK Plastics Pact – an initiative bringing together businesses from across the entire plastics value chain with UK Government and NGOs to tackle plastic waste.

The voluntary initiatives are also complemented by regulatory obligations, including the UK Plastic Packaging Tax, which came into force on 1 April 2022 and charges manufacturers or importers of plastic packaging components containing less than 30 per cent recycled plastic.

Momentum is growing to find solutions to these hard-to-recycle plastics, yet with solutions focused on the downstream aspects of the problem, e.g on the waste management rather than on their phase-out or redesign, the current combination of industry initiatives and regulatory approaches are fraught with issues and have the potential to lead to greenwashing.

The scandal revealed

This briefing reveals how interim supermarket and industry schemes sold to the public as helping to attain recycling targets do not live up to their billing.

It also discloses how an industry fund to encourage soft plastic recycling in the UK introduced by the world's biggest plastic producers does not adequately address the scale of the issue and has yet to become operational, how, at the heart of Government, an MP paid to chair a packaging industry lobby group can directly influence an all-Party Parliamentary group he also chairs and how current Government funding prioritises recycling over reduction measures.

EIA's research confirms that the world urgently needs ambitious and coordinated efforts across borders and supply chains – and, crucially, reflected in national legislation – to adequately address the soft plastics scandal. The lack of effective action on this pervasive form of plastic is driving plastic pollution and harming our environment, ecosystems and health.

Below: Many supermarkets now have interim in-store soft plastics collection points



UK supermarket soft plastic takeback schemes – where does the waste go?

In response to widespread consumer demand as well as voluntary targets and regulatory obligations, UK supermarkets have recently created voluntary in-store soft plastic takeback schemes as interim measures to address the soft plastic packaging issue due to the lack of kerbside collection.

Concerned customers are encouraged to return this waste via in-store bins provided. The premise is that supermarkets can then organise the waste treatment and recycling of their soft plastic packaging. These schemes allow consumers to feel they are 'doing the right thing' and that these plastics will be dealt with responsibly – yet the reality is quite different.

Both Sainsbury's and Tesco have contracted a UK waste reprocessing company, Eurokey Recycling Ltd, to manage their collected soft plastic waste. Rather than using domestic recycling facilities, which lack recycling capacity for this waste stream, Eurokey has been found to export these wastes.

It has been found that the waste collected are initially sent to Poland, but the actual destination is unknown. The lack of transparency and traceability in the plastic waste trade is one of the key concerns for ensuring its responsible and environmentally sound management.

EIA has found that Eurokey seeks to expand within the UK and given its track record of permit suspensions for breaching regulations, more clarity about the journey of British soft plastics is required to ensure these schemes are not contributing to unethical practices within a trade which perpetuates environmental, social and human health harm.

UK Flexible Plastic Fund inadequate and has yet to pay out

In May 2021, some of the world's top polluting brands – Mars, Mondelēz International, Nestlé, PepsiCo and Unilever, which are also privy to regulatory obligations such as the UK Government's plastic tax and extended producer responsibility obligations for packaging – joined forces to set up the UK Flexible Plastic Fund to help build the currently non-existent soft plastics UK recycling market.

They aim to do this by providing financial incentives to recyclers, guaranteeing a minimum value of £100 per tonne of recycled product to process soft plastic. The Fund hopes to work in tandem with supermarkets with soft plastic in-store collection points and these brands would then receive credits (known as Packaging Recovery Notes or PRNs) allowing them to fulfil their regulatory obligations.

However, these multi-million pound companies are advertising the Fund as a flagship initiative, despite it likely facilitating the recycling of only a very small proportion of soft plastic packaging currently disposed of, especially given these brands are not prioritising absolute reduction measures within their voluntary targets.

These global companies collectively put just £1m into the Flexible Plastic Fund per annum, which, according to our calculations, would only be enough to cover approximately 10,000 tonnes of soft plastic. For reference, in 2019 and 2020, the majority of soft plastics placed on the market (288,750 and 287,500 tonnes respectively) were disposed of,

meaning this scheme would barely scratch the surface of the true volume of soft plastics on our shelves.

Additionally, technical and economic barriers have meant that the Fund has yet to become operational, while soft plastics continue to flood the market.

A political conflict of interest?

Reflecting public consensus – for instance, 92 per cent of UK citizens polled in 2021 were concerned about plastic pollution – the UK Government has committed to ensuring that those placing plastic packaging on the market, such as the packaging industry, are responsible for the costs of its treatment. This is known as ‘the polluter pays’ principle.

However, EIA has found that the All-Party Parliamentary Group (APPG) for the Packaging Manufacturing Industry is lobbied by the Food Packaging Association (FPA), which represents the industry to all four UK governments and engages with key Government departments and committees. The FPA takes the position that people, not producers, are responsible for plastic pollution and has been pushing to pause the implementation of related UK policies currently being developed, including Extended Producer Responsibility (EPR) for packaging.

More concerning is that the paid Chair of the FPA is Mark Pawsey, MP for Rugby and Bulkington, who is also the Chair of the APPG for the Packaging Manufacturing Industry. As an MP, he has also reflected a similar stance in Government debates.

For context, the House of Commons Standards Committee recently described APPGs as potentially becoming “the next great parliamentary scandal.” It has recommended that MPs cannot lobby on behalf of someone paying them and supports an outright ban on MPs providing paid Parliamentary advice, consultancy or strategy services.

Pawsey was approached by EIA for comment as to whether he considered his secondary employment as Chairman of the Foodservice Packaging Association and his role as Chair of the APPG for the Packaging Manufacturing Industry to be a conflict of interest.

While his response did not address our question, he did state that in 2020, when asked by the members of FPA to take on the role of Chair, he immediately declared this interest on the Parliamentary Register of Members’ Financial Interests and has drawn attention to it on each occasion that he has spoken on matters relating to the sector in Parliament.

EIA reviewed Hansard, the official parliamentary record for what was said during debates, and found four separate instances where Pawsey spoke on packaging or plastics in Parliament but did not declare this interest.

Additionally, current Government funding in plastic packaging innovations and solutions through the UK Research and Innovation (UKRI), a non-departmental public body, is heavily skewed to supporting recycling (including the highly problematic development of chemical recycling) over reusable and refillable packaging, the systems which will ultimately enable plastic reduction and so meaningfully address plastic pollution.

The above serve to demonstrate both industry and Government’s lacklustre application of the ‘polluter pays’ principle.

Below: Mark Pawsey, MP for Rugby and Bulkington



Below: Turkey currently gets the highest amount of UK plastic waste exports



Recommendations

The public's goodwill and concerns about plastic pollution should not be met with false solutions and greenwashing. We recommend that the UK Government:

- bans plastic waste exports to both non-Organisation for Economic Co-operation and Development (OECD) and OECD countries
- within the Environment Act, set a sole target of halving resource consumption by 2050 and material specific reduction targets including plastic. This includes:
 - eliminating non-recyclable plastic packaging, including non-essential hard-to-recycle packaging like soft plastics
 - setting mandated targets to reduce plastic packaging by 50 per cent by 2025 (against a 2019 baseline)
 - Government to pursue and support standardisation of reusable packaging and providing adequate support through financial incentives to scale these systems
- does not water down the UK's Extended Producer Responsibility scheme for Packaging.

For more information, including references and further detail to substantiate these claims, please refer to [The Great UK Soft Plastics Scandal](#) (long version with supporting evidence).

