

## The Great UK Soft Plastics Scandal

### 1. Introduction

Plastic pollution resulting from rampant overproduction of plastics and their lifecycles is irreversible, directly undermines our health, drives biodiversity loss, exacerbates climate change, and risks generating large-scale harmful environmental changes.<sup>1</sup>

There is widespread anxiety about the detrimental effects of plastic pollution, including being a major issue for the British public. In 2021, 92 per cent of UK citizens polled were concerned about plastic pollution, two-thirds thought plastic pollution is as bad, or worse, than it was before the pandemic and almost 80 per cent were actively taking steps to reduce their use of single-use plastic but did not feel like companies are doing enough.<sup>2</sup> In 2019, a similar UK poll found 56 per cent of UK public respondents thought banning single-use plastics would be most effective and 74 per cent said the Government needs to do more.<sup>3</sup> It is not just UK citizens who are concerned – the plastic pollution emergency<sup>4</sup> has captured the attention of the world. It is clear that the majority of people agree that plastic reduction is necessary, especially single-use plastics.<sup>5</sup> – in 2022, a global poll found that 75 per cent people worldwide want single-use plastics banned.<sup>6</sup>

The UK is the second largest producer of plastic waste per capita in the world, creating 99kg per person in 2016.<sup>7</sup> At the same time, it is failing to address the use of one of the key components of our plastic problem - soft plastics. The majority of which are not recycled.

The UK Government is not taking enough initiative to solve the problem of this hard-to-recycle plastic waste stream. The majority of UK councils cannot collect soft plastic packaging for recycling from households, and Government funding initiatives are prioritising recycling, including the problematic development of chemical recycling, over reduction. The UK is lagging behind countries such as France, which has recently banned plastic packaging for the majority of fruits and vegetables sold in French supermarkets altogether.<sup>8</sup> As a result false solutions are being developed that aim to perpetuate the status quo.

We urgently need ambitious and coordinated efforts across borders and supply chains – and, crucially, reflected in national legislation – to address the plastic pollution emergency in which we now find ourselves. The primary solutions being plastic reduction and reuse - which will allow us to consume more sustainably.

Both measures are not only possible, but achievable, with political will. For instance, the UK Government was a big proponent of the decision<sup>9</sup> to negotiate a new legally binding treaty to end plastic pollution, which among many binding measures is looking to address sustainable production and consumption of plastics.<sup>10</sup> Additionally, research demonstrates that UK supermarkets, which place a significant amount of single-use plastic onto the UK market, can cut their plastic packaging in half by 2025, with soft plastic packaging product categories such as fruits, salads and vegetables

making up a huge amount of packaging with the greatest potential for significant plastic reduction.<sup>11</sup>

## **2. The UK's soft plastic waste crisis**

Soft/flexible/film plastic packaging<sup>12</sup> [henceforth 'soft plastics'] can include products such as plastic carrier bags, bread and cereal bags, cling film, bubble wrap, magazine wrap and shrink wrap (to package multi-pack products such as drink containers, tinned food and toilet paper). They are typically single-use, difficult to recycle and there is little recycling market within the UK, despite them currently making up a considerable amount of total consumer plastic packaging waste.

In 2019, 93 per cent of plastic film packaging<sup>13</sup> placed on the market was not recycled, accounting for 25 per cent of the 1,155,000 tonnes of total plastic packaging waste that was disposed of that year.<sup>14</sup> In 2020, the collection rate of plastic film packaging for recycling was eight per cent, amounting to a total of 25,000 tonnes, thus meaning that 92 per cent of plastic film packaging placed on the market was not recycled and of the 828,000 tonnes of plastic packaging not collected for recycling, 38 per cent was plastic film<sup>15</sup>. Whether disposed of or rejected at recycling facilities that cannot recycle them, these soft plastics are likely dumped in landfills or incinerated, including being treated in energy-from-waste facilities<sup>16</sup> and as refuse-derived fuel, all of which have their own harmful environmental, social and human health impacts.

This is exacerbated by the fact these types of plastic waste are typically not collected from UK households for recycling. Only 49 local authorities (13 per cent) collected plastic film packaging from households in 2020, with 20 of these accepting only carrier bag plastic film waste<sup>17</sup>. Of the plastic packaging collected for recycling in those areas, only four per cent was plastic film despite it accounting for 22 per cent of plastic packaging consumed by households.<sup>18</sup> This is worsened by a lack in relevant Government policy,<sup>19</sup> with England for instance currently consulting on local authority household collection where it is proposed plastic film collection should be adopted no later than 2026-27.

Public, industry and Government ambition and drive are all vital as we work towards reducing plastic consumption and pollution. However current industry and Government action (or inaction) has led to the creation of complex false solutions which fundamentally fail to address the surging volumes of single-use soft plastic packaging<sup>20</sup> or the problems they create.

## **3. Lack of collection and reduction Government policy leading to troubling quick fixes**

In a bid to attain their UK voluntary Plastics Pact targets (i),<sup>21</sup> and other regulatory obligations such as the UK Plastic Packaging Tax (ii) which came into force in April 2022,<sup>22</sup> UK supermarkets and brands, which are the primary producers and distributors of soft plastic packaging, are finding new ways to deal with this problematic waste stream.

## **UK supermarket soft plastic takeback schemes and the opaque plastic waste trade**

Stepping into the void created by a lack of domestic kerbside collection, a number of UK supermarkets<sup>23</sup> have been trialling and expanding in-store soft plastic takeback schemes, including Sainsburys, Aldi, Co-op, Waitrose, Tesco, Iceland, Lidl and M&S, while Morrisons co-owns a recycling facility that will be able to handle soft plastics.<sup>24</sup>

In essence, these schemes provide in-store bins where customers can bring back their flexible packaging waste for it to be recycled. However, these interim industry-led schemes, which have sprung up in the absence of policy or domestic infrastructure, are fraught with issues and have the potential to lead to greenwashing.

Given there is little market to recycle soft plastics domestically – and questions remain whether these materials can truly be safely and effectively recycled - some UK supermarkets are exporting the soft plastic waste they collect for treatment overseas. However, these exports are marred with a lack of transparency and permit suspensions.

A 2021 ENDS Report story found that Tesco and Sainsbury's had contracted the UK waste company Eurokey Recycling Ltd to reprocess in-store collected soft plastics at Eurokey's facility in Zielona Góra, Poland.<sup>25</sup> Eurokey is a specialist packaging and reprocessing service provider focused on non-contaminated plastic and packaging waste. It does not provide end-to-end recycling services. It receives materials as mixed plastic bales, which it then sorts, grades and dispatches to accredited reprocessors in the UK and continental Europe. However, Eurokey has previously refused to provide any detail on where the material sent to this facility ends up,<sup>26</sup> nor how much it actually receives, and it has received formal complaints from local residents about poor storage management at its Polish facility.<sup>27</sup>

In 2018, Eurokey was flagged by the EU WasteForce Project (iii) in a published illegal waste case study, where plastic waste illegally exported from Chelmsford was found in bales stockpiled in Hong Kong, ready to go into landfill (the route identified occurring via Poland).<sup>28</sup> In 2022, Engineering & Technology News also found that Eurokey had its accreditation as an exporter of packaging waste suspended by the Environment Agency (EA) in November 2021 for six days, following several breaches of regulations in the way it exported plastic waste to sites in Turkey,<sup>29</sup> Poland and the Netherlands.<sup>30</sup> Bloomberg later published an investigative piece showcasing how soft plastics collected by Tesco, and managed by EuroKey, were sent to a plastic bag manufacturing recycling factory in Eastern Poland, a waste-to-energy cement kiln facility near Wroclaw, Poland (iv) and to Adana, Southern Turkey.<sup>31</sup> And Engineering and Technology News later confirmed that none of the flexible plastic waste collected by Sainsbury's via its in-store schemes is recycled in the UK either – it is also exported to Europe via its contract with Eurokey.<sup>32</sup>

In 2021, Eurokey<sup>33</sup> publicly announced plans to develop a 70,000 tonnes a year recycling facility in Northamptonshire to specifically recover films and flexible plastics from the grocery and retail sectors. In particular, it stated “the material, which will include packaging from bakery and confectionery products, bags from prepared salad and food trays, would come from supermarkets including Sainsbury’s and Tesco.”<sup>34</sup>

However, EIA has found that within Eurokey’s April 2021 Northamptonshire Council Planning Statement for the facility, its intention was that this facility would be specifically used for commercial and post-industrial plastic waste and did not specifically reference post-consumer plastic waste (such as soft plastic packaging).<sup>35</sup> When put to them, Eurokey responded to state: “As part of our consumer flexible film recycling trial with UK supermarkets, all the material we collect is managed similarly to non-contaminated plastic film and sent for reprocessing in our wholly owned and operated facilities in Poland. The trial has demonstrated a negligible impact to the quality of the material we process and bring to market. When the Kettering facility begins operation, it will enable us to continue to recover these under-recycled resources while reducing our reliance on export.”

Eurokey<sup>36</sup> expects the 70,000 tonnes a year recycling facility in Northamptonshire to be operational by the end of June 2022; however, further clarification as to whether this facility would send sorted plastic film to be recycled domestically or to continue to export post-consumer soft plastic packaging waste abroad is needed,<sup>37</sup> especially given that Eurokey is still listed on the public register of accredited reproprocessors and exporters on the national packaging waste database as a large and active plastic packaging waste exporter<sup>38</sup> still currently exporting plastic waste.<sup>39</sup> It is still also contracted by some UK supermarkets to handle their soft plastic waste collected in-store.<sup>40</sup>

Any business or organisation which produces, uses or sells packaged goods is classed as an obligated packaging producer within the UK and must take part of the UK’s producer responsibility scheme for packaging and meet recycling obligations. This includes UK supermarkets such as Sainsbury’s, Tesco and all others which are also setting up soft plastic in-store takeback schemes. Among other rules, obligated packaging producers must follow waste duty-of-care rules, which include not allowing the waste carrier contracted to dispose of waste to do so illegally.<sup>41</sup>

This current system of exporting plastic waste, including the exporting of soft plastics from supermarket in-store takeback schemes, is of serious concern for four primary reasons:

- high-income countries, such as the UK, exporting plastic waste is an unethical practice resulting in environmental, social and human health harm.<sup>42</sup> The UK is the second largest producer of plastic waste per capita in the world, creating 99kg per person in 2016,<sup>43</sup> and has consistently been one of the largest plastic waste exporting countries, becoming structurally dependent on exporting waste to other countries despite the documented harm this causes. This is an environmental justice issue<sup>44</sup>

- representatives of the UK waste industry are concerned that the UK plastic packaging tax could lead to increased plastic waste exports rather than incentivising domestic recycling<sup>45</sup>
- in 2019, the UK achieved a plastic packaging recycling rate of 49.6 per cent, but this was only possible because 61 per cent of plastic packaging was exported for recycling.<sup>46</sup> However, the current packaging producer responsibility system within the UK assumed that 100 per cent of plastic packaging waste is recycled at point of export,<sup>47</sup> which is likely not the case (v), thus falsely inflating the recycling figures, given the UK's high rate of packaging waste exports
- the more difficult plastic waste is to recycle, the more vulnerable it is to mismanagement and illegality. The plastic waste trade is inherently opaque, with publicly accessible data limited, which plays a role in facilitating and obscuring illegal trade, an issue raised by the UK Environment Agency.<sup>48</sup> For reference, in 2019 the European Commission estimated that the revenue of the EU illicit waste market for 23 member states could be as high as €15 billion, with the UK amounting to €4.3 billion euros of that.<sup>49</sup>

### **The UK Flexible Plastic Fund and perpetuation of the linear status quo**

One of the ways brands are seeking to get in line with the UK plastic packaging tax obligations was the creation in May 2021 of the £1 million a year UK Flexible Plastic Fund, funded by Mars UK, Mondelēz International, Nestlé, PepsiCo, Unilever and now, other members.<sup>50</sup> All five founding companies were found to be within the global top 10 polluting brands in 2021 following audits conducted by Break Free From Plastic.<sup>51</sup>

The aim of the fund is to increase the supply of recycled plastic to adhere to the UK plastic packaging tax and to build the currently non-existent UK soft plastic recycling market. The Flexible Plastic Fund aims to overcome these barriers by offering financial incentives for flexible plastics recycling and encouraging the whole system to be more transparent, ahead of anticipated widespread household plastic film collections in five years' time in England.

It will do so by incentivising recyclers to take soft plastic waste by guaranteeing a minimum value of £100 per tonne of recycled product to process soft plastic (predominantly in the UK)<sup>52</sup>. Subsequently, Fund members will receive Packaging Recovery Notes (PRNs) for the soft plastic recycled, thus also allowing them to meet their Producer Responsibility requirements.<sup>53</sup> Brand members will achieve this by partnering with UK supermarkets with in-store flexible plastic takeback schemes, citing that Sainsbury's and Waitrose already form part of the Flexible Plastic Fund.<sup>54</sup>

The Flexible Plastic Fund has stated it and its members are in regular dialogue with all UK retailers which collect flexible plastics in-store, as well as with their partner recyclers, to find ways to encourage flexible plastics recycling in the UK while increasing the traceability of what happens to the materials once collected. It is important to note that the Fund has not yet made any payments to recyclers. It states that technical and economic barriers have led to a slow uptake of the funding via PRNs and is currently revising its payment mechanism as well as exploring additional initiatives and waste streams to make post-consumer flexible plastic recycling viable.

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 is misleading<sup>55</sup> if coupled with voluntary plastic packaging targets currently in place. For instance, a minimum value of £100 per tonne could result in approximately only 10,000 tonnes of soft plastic falling under the scope of the scheme. For reference, in 2019 and 2020, the majority of soft plastic packaging placed on the market were disposed of (288,750 and 287,500 tonnes respectively) meaning the size of the fund currently cannot meet the scale of soft plastic use.

Voluntary industry plastic reduction targets are either non-existent or fail to address the soft plastic waste crisis. Recycling plays a role in enhancing a circular and sustainable economy, but without safeguards in place it could still result in increased production of hard-to-recycle soft plastic waste (also accounting for the high levels of soft plastic residuals at point of sorting and recycling). The required safeguards include reduction targets, a strict application of the waste hierarchy (vi) and restrictions on harmful additives which can facilitate toxic recycling.

There are currently no UK mandated Government plastic reduction targets and the UK voluntary industry targets currently in place do not address the specific challenges of soft plastics. For instance, the volume of UK supermarket plastic packaging placed on the market between 2017-19 increased, despite voluntary targets being in place.<sup>56</sup> The UK Plastics Pact, of which many UK supermarkets and brands are members, despite stating soft plastic lack of recycling was their number one priority, does not measure soft plastics elimination within its elimination target. Furthermore, it only focuses on recycling capacity rather than reduction, redesign and reuse for this problematic waste stream. Additionally, of the five brands which initially created the UK Flexible Plastic Fund, it is thought that all but one currently has an absolute plastic reduction target. (vii)

#### **4. Government investment into false solutions**

##### **Secondary parliamentary employment and industry lobbying undermining the polluter-pays principle**

The above industry initiatives have Government support. The UK Flexible Plastic Fund also has the support<sup>57</sup> of Mark Pawsey MP for Rugby and Bulkington.<sup>58</sup> City AM reported that, since 2020, he has had a second job outside of Parliament as a £30,000-a-year<sup>59</sup> Chairman of a packaging lobby group, the Foodservice Packaging Association (FPA).<sup>60</sup> The Foodservice Packaging Association represents the industry with all four UK governments and engages with key government departments and committees.

The FPA takes the stance that people, not producers, are responsible for plastic pollution<sup>61</sup> and has been pushing to pause the implementation of UK policies currently being developed, including extended producer responsibility for packaging.<sup>62</sup> Pawsey is also Chair of the All-Party Parliamentary Group (APPG) for the Packaging Manufacturing Industry.<sup>63</sup> This APPG,<sup>64</sup> which is also attended by the Foodservice Packaging Association,<sup>65</sup> views citizen responsibility to be the key ingredient, both in

participating in recycling and in eliminating littering behaviour. This is a view shared by Pawsey; for instance, in January 2021 during the Government's Environment Bill debate he argued that the greater costs for packaging recycling and disposal to minimise their environmental harm should not fall on producers, also stating: "It is not the packaging manufacturer that is the polluter – people are."<sup>66</sup>

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 prior to becoming an MP, while running a business in the foodservice packaging sector, he was previously an industry member of the Foodservice Packaging Association (then named the British Disposable Products Association) and that in [April] 2020, when asked by the members of Foodservice Packaging Association to take on the role of chairman, he immediately declared this interest on the Register of Members' Interests and has drawn attention to it on each occasion that he has spoken on matters relating to the sector in Parliament. However, EIA found four separate instances where Pawsey spoke of packaging or plastic in Parliament but did not declare this interest.<sup>67</sup>

This raises serious concerns about how industry lobbying may be holding the Government back on taking adequate action over plastic packaging and waste. In April 2022, the House of Commons Committee on Standards published a report on improving governance and regulation of All-Party Parliamentary Groups and concluded that they were "... concerned that if left unchecked, APPGs could represent the next great parliamentary scandal, with commercial entities effectively buying access to and the influence of parliamentarians and decision-makers."<sup>68</sup> Following that, in May 2022, the House of Commons Committee on Standards published recommendations, including tightening lobbying rules so MPs cannot lobby on behalf of someone paying them and an outright ban on MPs providing paid parliamentary advice, consultancy or strategy services.<sup>69</sup>

In addition, Pawsey's support of industry initiatives concerning soft plastic packaging, currently entirely dependent on public goodwill via in-store collection schemes, (viii) also serves to demonstrate both industry and Government's lacklustre application of the 'polluter pays' principle. For reference, the Government states it is committed to the 'polluter pays' principle and that "the responsibility for and the cost of treatment or disposal of post-consumer products sits fairly and squarely with producers and not taxpayers" as mentioned in the Government's 25 Year Environment Plan (2018), the Resources and Waste Strategy for England (2018) and the Conservative Party Manifesto (2019). (ix)

### **Government prioritising recycling, including chemical recycling, over reduction**

When it comes to Government funding in plastic packaging innovations and solutions, in 2020 the UK Research and Innovation (UKRI) (x) funded four projects for a total of £20m, three of which were chemical recycling projects.<sup>70</sup> These four UKRI-funded projects also received a total of £65m of industry investment. In 2022, the UKRI awarded an additional £30 million to 18 plastic packaging projects; these projects also

included further investments into chemical recycling, with only four of the projects looking into reuse/refill systems (the systems which will ultimately enable plastic reduction).<sup>71</sup> Again, this demonstrates that current action serves to perpetuate the status quo of recycling being afforded primary importance over plastic reduction.

Creating domestic recycling capacity for soft plastics alone is not the answer. In 2019, Rebecca Pow, Parliamentary Under-Secretary of State for Nature Recovery and the Domestic Environment, stated that introducing 'producer fees' through a plastics tax would hopefully result in a system whereby "producers will be financially incentivised to use more recyclable packaging as a way to drive non-recyclable and difficult to recycle packaging off the market."<sup>72</sup>

This is an approach which incentivises recycling.<sup>73</sup> However, a UK soft plastic recycling system alone, especially one currently entirely reliant on customer goodwill and so dependent on exports, will not solve the soft plastic waste crisis nor will it necessarily drive non-recyclable and difficult to recycle packaging off the market.

The main reasons for this include:

- soft plastics have a significantly high rate of target material loss occurring both at the sorting and recycling stages, in addition to affecting the recovery rates of other waste materials.<sup>74</sup> Even if they are recycled, they are not necessarily easy to recycle
- soft plastics are typically either downcycled into non-food contact packaging and non-packaging applications<sup>75</sup> or they are chemically recycled. There are (at times significant) losses occurring with each chemical recycling lifecycle, whereby virgin polymer plastics are still required. Studies show that "the evidence base for the significant adoption of chemical recycling technologies is limited, lacking detail and it remains unclear what role they might play."<sup>76</sup>
- to incentivise circularity, the Fund has a pricing hierarchy where food-grade plastic film benefits from a higher EPR (Extended Producer Responsibility) Package Recovery note price than non-packaging material.<sup>77</sup> However, neither pricing nor either of these end-of-life recycling options or ever-increasing recycling infrastructure resolves the driver behind the current plastic waste crisis, which is over-production and over-consumption. Ultimately, in spite of increased levels of collection, whether at kerbside or in-store, the UK Flexible Plastic Fund and increased levels of recycling could still result in increasing amounts of hard-to-recycle soft plastic packaging being placed on the market.

## 5. Conclusions and recommendations

Current Government and industry action is not sufficient to tackle this crisis, are fraught with opacity and inflate their actual positive impact. The elimination of non-essential single-use soft plastics and a Government mandated plastic reduction target are essential to meet the challenges at hand. The Ellen McArthur Foundation states that flexible (soft) packaging is not only the fastest-growing plastic packaging category but also "by far the most challenging market segment to address on the journey towards a circular economy for plastics" and also calls for direct elimination of non-essential soft plastics.<sup>78</sup>



EIA is concerned that supermarket in-store takeback schemes and the Flexible Plastic Fund are being presented as flagship initiatives to address the UK soft plastic waste crisis, despite the treatment of this plastic waste being opaque, the Fund being a relatively small investment and industry voluntary reduction targets being insufficient.

EIA is also concerned that the Government is supporting such industry initiatives and the development of chemical recycling infrastructure while at the same time delaying and weakening safeguarding policies of crucial importance – including consistent household collections of plastic film, Extended Producer Responsibility for Packaging,<sup>79</sup> Deposit Return Schemes for England,<sup>80</sup> Wales and Scotland,<sup>81</sup> a ban on plastic waste exports (xi) and a plastic reduction target within the Environment Act. (xii) Industry requires an adequate legislative framework to help them achieve plastic reduction.

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

1. bans plastic waste exports<sup>82</sup> to both non-Organisation for Economic Co-operation and Development (OECD) and OECD countries. The UK Government committed to consulting on banning plastic waste exports to non-OECD countries in 2019. This ban should also include OECD countries, namely Turkey, which are currently recipients of large amounts of UK plastic waste.<sup>83</sup>
2. 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<sup>84</sup>
  - setting mandated targets to reduce plastic packaging by 50 per cent by 2025 (against a 2019 baseline)<sup>85</sup>
  - Government to pursue and support standardisation of reusable packaging and providing adequate support through financial incentives<sup>86</sup>
3. does not water down the UK's Extended Producer Responsibility scheme for Packaging,<sup>87</sup> including the Government proposal currently resulting in producers paying £1 billion less than originally planned<sup>88</sup>

## ANNEX 1: Soft plastic in-store takeback schemes in the media

Supermarket	Soft Plastic In-store takeback scheme in the media
Sainsbury's	As of February 2021, <a href="#">Sainsbury's has launched take-back schemes in 63 stores in north-east England for PP (polypropylene) film packaging for recycling</a> . As of June 2021, <a href="#">it has announced plans to roll out take-back schemes in 520 stores, after having joined the Flexible Plastic Fund in May</a> .
Aldi	As of May 2021, <a href="#">Aldi has soft plastic take-back schemes in 20 stores in Yorkshire, Derbyshire and Greater Manchester</a> . If successful, the scheme will be rolled out to all of Aldi's UK stores.
Co-op	<a href="#">Co-op has take-back schemes in more than 800 stores in England, Scotland, Northern Ireland, Isle of Man and Wales. In 2020, it sent soft plastics collected in its 50 store take-back trial to the UK plastics recycling business Jayplas, which used as much of the material as possible to make waste disposal bin liners.</a>
Waitrose	As of May 2021, <a href="#">Waitrose has a take-back scheme trial in 37 stores in the north of England for 12 weeks</a> .
Tesco	As of August 2021, <a href="#">Tesco take-back schemes are available in all of its large stores</a> . From this, it expects to collect and recycle 1,000 tonnes of plastic a year. In a sample in 2021, Tesco was able to recover 80 per cent of the soft plastic returned, with the remaining 20 per cent going for energy recovery.
Iceland	<a href="#">As of March 2022, Iceland had a take-back scheme in all of its Food Warehouse stores, which is more than 140 stores.</a>
Lidl	As of October 2021, <a href="#">Lidl launched a take-back scheme trial in 12 stores in the West Midlands, stating that if successful it will extend it nationwide</a> .
M&S	<a href="#">M&amp;S announced it would roll-out its take-back schemes nationwide by end 2019 in January 2019 and that this waste would be recycled into store fittings, furniture and playground equipment for schools. As of December 2020, it had reported having plastic take-back schemes in 16 stores.</a>
Morrisons	Morrisons announced it was launching <a href="#">six 'zero waste' store in Edinburgh</a> and has a partnership with Nestlé to collect and recycle all 'hard-to-recycle' soft plastics, with all waste collected to be recycled in the UK and not exported. In November 2021, Morrisons announced it co-owns <a href="#">its first recycling facility in Fife</a> to reprocess soft plastics collected into plastic flakes, pellets and boards. It is estimated the plant will initially recycle 15,000 tonnes per annum. <a href="#">Nestlé, Yes Recycling's first investor, has provided a pre-investment of £1.65million towards the site</a> . The investment will be returned as Packaging Recovery Notes.

## NOTES

- (i) The UK Government has the objective that all plastic packaging placed on the market needs to be recyclable, reusable or compostable by 2025. The UK Plastics Pact and its members (including several UK supermarkets) have also committed to this target. However, their progress had been stagnating around 65% since 2018 with them citing that if mono-material polyethylene and polypropylene films were recycled, 83% of packaging would be classed as recyclable
- (ii) Which will charge manufacturers and importers £200 per tonne of plastic packaging components which contain less than 30% recycled plastic
- (iii) WasteForce is the project acronym for Deterring and disrupting illegal trade and management of Waste. It is a project that is funded by the European Union's Internal Security Fund – Police
- (iv) In response to EIA, Eurokey Recycling Ltd stated that "A very small percentage of the material we process is determined to be non-recyclable and is sent to waste-to-energy or an approved reprocessor which meets our accreditation and the UK Environment Agency's regulations. We do not send any material to landfill."
- (v) For instance, UK recycling facilities do not have 100% recycling rates. One example includes Devon County Council's Recycling centres and rates. and current destination countries have high waste mismanagement rates, including Malaysia and Turkey.
- (vi) Waste prevention and re-use are the most preferred options, followed by, then energy recovery, while waste disposal through landfills should be the very last resort.
- (vii) For instance, UK supermarket plastic packaging placed on the market between 2017 and 2019 increased by 1.2%, despite voluntary targets in place. The UK Plastics Pact, despite stating soft plastic lack of recycling was there number one priority do not measure soft plastics elimination within their elimination target and only focus on recycling capacity rather than reduction, redesign and reuse for this problematic waste stream, and of the five multi-national manufacturers financing the £1 million UK Flexible Plastic Fund have incredibly unambitious voluntary plastic targets (i.e. Mars UK, Mondelez International, Nestle, PepsiCo, Unilever). All put one have an absolute plastic reduction target. Unilever aims to halve the amount of virgin plastic they use in their packaging and achieve an absolute reduction of more than 100,000 tonnes by 2025 .
- (viii) Please note, this is unlike a Deposit Return Scheme system whereby customers are directly refunded for the cost of packaging.
- (ix) Government state that they are committed to the 'polluter pays' principle, and that " the responsibility for and the cost of treatment or disposal of post-consumer products sits fairly and squarely with producers and not taxpayers" as mentioned in the Governments 25 Year Environment Plan (2018), the Resources and Waste Strategy for England (2018), and the Conservative Party Manifesto (2019).
- (x) Launched in April 2018, UKRI is a non-departmental public body sponsored by the Department for Business, Energy and Industrial Strategy (BEIS).
- (xi) The UK Government is aware of the loopholes facilitating illegal trade and mismanagement at end of life in particular, and recently launched two consultations on the reform of the waste carrier, broker, dealer registration system in England and the introduction of mandatory digital waste tracking . This was spurred by an explosive report highlighting the scale of illegal waste dumping occurring in the UK published in November 2021, which subsequently gained attention in Parliament . It is important to note that in 2019 the Conservative Party promised to launch a consultation on banning the export of plastic waste to non-OECD countries as a consequence of the harm UK plastic waste exports cause however despite the urgency of the issue or the publication of evidence of UK plastic waste exports being illegally shipped, dumped and burned over the course of the last 3 years, this consultation has yet to be launched or is yet to consider an OECD country ban (despite Turkey, an OECD country, being the biggest recipient of UK plastic waste exports). For

reference, the UK's illicit waste market is estimated to be worth up to £3.7 billion – at least double than that of any other European state.

- (xii) Please note, the Government is also consulting on proposals to ban commonly littered single-use plastic items in England, however, this only currently considers banning the supply of single-use plastic plates, cutlery, balloon sticks, and expanded and extruded polystyrene cups and food and beverage containers in England, and no other soft plastic packaging formats.

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<sup>5</sup> United Nations (19 March 2020) Reducing Single-Use Plastic Pollution: A Unified Approach. [Available here](#).

<sup>6</sup> Reuters (22 February 2022) 75% of people want single-use plastics banned, global survey finds. [Available here](#).

<sup>7</sup> Law, K.L. et al. (2020). The United States' Contribution of Plastic Waste to Land and Ocean (Science Advances, Vol. 6, No. 44). [Available here](#).

<sup>8</sup> BBC (31 December 2021) French ban on plastic packaging for fruit and vegetables begins. [Available here](#).

<sup>9</sup> GOV UK (2 March 2022) Press Release: UK backs ambitious global action to tackle plastic pollution. [Available here](#).

<sup>10</sup> The New York Times (2 March 2022) The World Is Awash in Plastic. Nations Plan a Treaty to Fix That. [Available here](#).

<sup>11</sup> Greenpeace UK (28 August 2020) UNPACKED: How supermarkets can cut plastic packaging in half by 2025. [Available here](#).

<sup>12</sup> The terms can be used interchangeably but typically refer to different kind of plastics (soft, scrunchy, flexible, film, etc.) Source Circular. (16 August 2021) Plastic film and its 'sticky' journey to reprocessing. [Available here](#).

<sup>13</sup> According to Recoup this can include items such as plastic carrier bags, bread and cereal bags, cling film, bubble wrap, magazine wrap and shrink wrap (to package multi-pack products such as drink containers, tinned food and toilet paper). Source RECOUP (2020) UK Household Plastics Collection Survey. [Available here](#).

<sup>14</sup> WRAP (last accessed 17 June 2022). Plastic bags and wrapping: The complex challenges we must unpick. [Available here](#). And RECOUP (2020) UK Household Plastics Collection Survey. [Available here](#). Recoup found in 2019 that only 7% of plastic film placed on the market were collected from UK households for recycling, and of the 2,290,000 tonnes of plastic packaging placed on the market in 2019 1,155,000 tonnes was sent to landfill or energy recovery.

<sup>15</sup> RECOUP (2021) UK Household Plastics Collection Survey. [Available here](#).

<sup>16</sup> This including being treated in energy from waste facilities and as refuse derived fuel. Source: The Guardian (24 March 2022) Why are we burning our recycling? [Available here](#). And Powerday Commercial (last accessed 17 June 2022). Plastic Recycling Services. [Available here](#).

<sup>17</sup> RECOUP (2021) UK Household Plastics Collection Survey. [Available here](#).

<sup>18</sup> RECOUP (2020) UK Household Plastics Collection Survey. [Available here](#). and RECOUP (2021) UK Household Plastics Collection Survey. [Available here](#).

<sup>19</sup> The Government is currently consulting on consistent recycling collections for England (not Wales, Scotland and Northern Ireland), the current proposal states that local authorities should adopt the collection of plastic film material from all households no later than 2027. Source: Wildlife and Countryside Link (July 2021) Consultation on Consistency in Household and Business Recycling in England. [Available here](#). And ENDS (28 March 2022) EPR consultation response analysis: 14 things you need to know. [Available here](#).

<sup>20</sup> "The United Kingdom Plastic Packaging market was expected to register a CAGR of 2.87% during the forecast period (2021-2026). In few places, COVID-19 is being used as a way to bring back single-use plastic bags rather than accepting reusable ones." Source: Mordor Intelligence (last accessed 17 June 2022) UNITED KINGDOM PLASTIC PACKAGING MARKET - GROWTH, TRENDS, COVID-19 IMPACT, AND FORECASTS (2022 - 2027). [Available here](#).

<sup>21</sup> The UK Government has the objective that all plastic packaging placed on the market needs to be recyclable, reusable or compostable by 2025. The UK Plastics Pact and its members (including several UK

supermarkets) have also committed to this target. However, their progress had been stagnating around 65% since 2018 with them citing that if mono-material polyethylene and polypropylene films were recycled, 83% of packaging would be classed as recyclable. Source: The UK Plastics Pact (November 2021) Annual Report 2020- 2021. [Available here](#).

<sup>22</sup> GOV UK (15 December 2020) Guidance: Packaging waste: producer responsibilities. [Available here](#). And GOV UK (15 December 2020) Guidance: Plastic Packaging Tax: steps to take. [Available here](#).

<sup>23</sup> Please refer to Annex 1 for more information. This includes [Sainsburys](#), [Aldi](#), [Co-op](#), [Waitrose](#), [Tesco](#), [Iceland](#), [Lidl](#), [Marks and Spencer's](#), and [Morrisons](#) (who co-own their own recycling facility).

<sup>24</sup> This facility also received a pre-investment of £1.65 million from Nestlé, which will be returned to them (more information please refer to Annex 1). Additionally, [£470,000 was awarded to Fife Council](#) from the Scottish Government's Recycling Improvement Fund to help with plastic film household collecting in Fife for the facility.

<sup>25</sup> ENDS (10 June 2021) Does a major recycling drive by big retailers stand up to scrutiny? [Available here](#).

<sup>26</sup> ENDS (10 June 2021) Does a major recycling drive by big retailers stand up to scrutiny? [Available here](#).

<sup>27</sup> Zielona gora naszemiasto (2 August 2021) Zielona Góra. Nowe osiedle, galeria i zielone skwery. Kiedy możemy spodziewać się zmian na Zastalu? [Available here](#). And Zielona gora naszemiasto (6 February 2021) Recykling w Goleniowskim Parku Przemysłowym. W Zielonej Górze narzekali na bałagan i odór. [Available here](#). And Gazeta Lubuska (29 June 2018) Mieszkańcy Sulechowa i Zielonej Góry obawiają się nowej inwestycji i recyklingu odpadów. [Available here](#). And "Then we press in a special machine and sell it to companies dealing with their recycling - explains Zubair Bajwa." Source: Wyborcza (22 April 2016) Wagonów nie zmontują. To co robią Anglicy w hali Zastalu? [INWESTYCJE]. [Available here](#).

<sup>28</sup> Waste Force (28 February 2019) WasteForce Crime Alert #1 January 2018 – January 2019. [Available here](#).

<sup>29</sup> In its suspension notice, the Environment Agency said Eurokey had in at least four months of last year exported plastic waste to Turkish sites that weren't authorized to process the material. Source: Bloomberg (29 March 2022) A Plastic Bag's 2,000-Mile Journey Shows the Messy Truth About Recycling. [Available here](#).

<sup>30</sup> Engineering and Technology (7 February 2022) UK supermarkets entangled in the murky world of plastic waste. [Available here](#).

<sup>31</sup> Bloomberg (29 March 2022) A Plastic Bag's 2,000-Mile Journey Shows the Messy Truth About Recycling. [Available here](#).

<sup>32</sup> Engineering & Technology News (28 April 2022) None of Sainsbury's flexible plastic recycled in the UK. [Available here](#).

<sup>33</sup> Which in March 2021 was acquired by the Reconomy Group for an undisclosed sum. Source: Lets Recycle (23 March 2021) Reconomy acquires Eurokey Recycling. [Available here](#).

<sup>34</sup> Lets Recycle (13 September 2021) Eurokey announces plans for 'supermarket sorting line'. [Available here](#).

<sup>35</sup> "It is the intention that Unit 1 be used specifically as a commercial waste recycling facility that accepts mixed waste which will typically be plastic..." and that "all the waste accepted on site will be post industrial waste and sourced from UK Supermarkets. The materials accepted on site will be that of which are taken off or around products prior to being placed onto the shelves. Therefore, the waste is clean material and has not reached the general public or from kerbside collections. The catchment of the material is national and from major UK Supermarkets such as Tesco, Sainsbury's M&S, Lidl, and Aldi. Source: Northamptonshire Country Council (April 2021) Planning Statement Eurokey Recycling Ltd. [Available here](#).

<sup>36</sup> Eurokey Recycling Ltd was acquired by the Reconomy Group in March 2021 for an undisclosed sum. Which in March 2021 was acquired by the Reconomy Group for an undisclosed sum. Source: Lets Recycle (23 March 2021) Reconomy acquires Eurokey Recycling. [Available here](#).

<sup>37</sup> Lets Recycle (13 September 2021) Eurokey announces plans for 'supermarket sorting line'. [Available here](#). And Circular (15 September 2021) Reconomy Owned Eurokey announce UK's first supermarket sorting line. [Available here](#).

<sup>38</sup> Environment Agency (last accessed 23 March 2022) National Packaging Waste Database: Public Register of Accredited Reprocessors and Exporters 2022. [Available here](#).

<sup>39</sup> UK Trade Info (last accessed 23 March 2022) Eurokey Recycling Ltd. [Available here](#). According to commodities traded Eurokey Recycling Ltd exported Waste, parings and scrap, of plastics (excl. that of polymers of ethylene, styrene, vinyl chloride and propylene) (Commodity code 39159080) in January 2022.

<sup>40</sup> Lets Recycle (24 June 2021) Sainsbury's expands flexible plastic collections. [Available here](#).

<sup>41</sup> GOV UK (last accessed 17 June 2022) Dispose of business or commercial waste. [Available here](#).

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- <sup>42</sup> RECOUP (2020) UK Household Plastics Collection Survey. [Available here](#). And Greenpeace UK (27 May 2020) The Recycling Myth 2.0: The toxic after-effects of imported plastic waste in Malaysia. [Available here](#). And Greenpeace UK (17 May 2021) Trashed: How the UK is still dumping plastic waste on the rest of the world. [Available here](#). And Basel Action Network (last accessed 23 March 2022) United Kingdom Export Data 2021 Annual Survey. [Available here](#). And Environmental Investigation Agency (EIA) (September 2021) The Truth Behind Trash: The scale and impact of the international trade in plastic waste. [Available here](#).
- <sup>43</sup> Law, K.L. et al. (2020). The United States' Contribution of Plastic Waste to Land and Ocean (Science Advances, Vol. 6, No. 44). [Available here](#).
- <sup>44</sup> Environmental Investigation Agency (September 2021) The Truth Behind Trash: The scale and impact of the international trade in plastic waste. [Available here](#).
- <sup>45</sup> Engineering & Technology News (31 March 2022) Plastic packaging tax could increase plastic exports, warn experts. [Available here](#).
- <sup>46</sup> RECOUP (2020) UK Household Plastics Collection Survey. [Available here](#).
- <sup>47</sup> Lets Recycle (19 July 2019) Levelling the playing field in plastics recycling. [Available here](#).
- <sup>48</sup> The Independent (11 April 2022) Ban all rubbish exports to crack down on waste crime, Environment Agency urges. [Available here](#).
- <sup>49</sup> European Commission (2021) Mapping the risk of serious and organised crime infiltrating legitimate businesses. p. 41 and p.42. [Available here](#).
- <sup>50</sup> EcoSurety (27 May 2021) Ecosurety boosts flexible plastic recycling in UK with FMCG and retail leaders. [Available here](#). The brand owners and retailers that provide funding and support the Flexible Plastic Fund include the five founding partners Mars UK, Mondelez International, Nestlé, PepsiCo and Unilever, joined by Abel & Cole, Ella's Kitchen, The Collective, Kiddylicious, Koninklijke Douwe Egberts, KP Snacks, McCain Foods, Tilda, United Biscuits, Vitaflo, Yeo Valley Farms, Lotus Bakeries, Natural Balance Foods, Ocado Retail and Warp Snacks.
- <sup>51</sup> Break Free from Plastic (2021) Brand Audit Report 2021. [Available here](#).
- <sup>52</sup> The initiative will provide fully audited transparency – at least 80% of the plastics collected will be recycled in the UK – rising to 100% by 2023. Until 2023, where there are currently limits in UK capacity and technology, up to 20% could be exported to qualifying facilities in Europe only. All material will be fully traceable and tracked from the collector through to new products.” – Source: EcoSurety (27 May 2021) Ecosurety boosts flexible plastic recycling in UK with FMCG and retail leaders. [Available here](#).
- <sup>53</sup> The Flexible Plastic Fund aims to recycle at least 80% of the plastics collected in the UK - rising to 100% by 2023. Until 2023, due to lack of capacity, up to 20% of soft plastic waste collected will be exported to Europe, likely for energy from waste recovery. The Flexible Plastic Fund (last accessed 23 March 2022) FAQs. [Available here](#). However, it is important to note that Tesco have said something similar “In a recent sample, Tesco was able to recover over 80% of the soft plastic returned by customers. It is now working with recyclers to explore what can be done with the remaining 20%, which is currently sent for energy recovery.” Source: Tesco (23 August 2021) Shoppers can now return all their soft plastic packaging to recycling points at every large Tesco store in the UK. [Available here](#). It is also important to note that as of 2021, the UK EPR system for packaging will not include a target for recovery of packaging waste and so no recovery obligation for 2021 and 2022. The targets will only be for recycling. This means there will be no accreditation for recovery operators for 2021 and 2022. This is based on the proposals in the 2019 consultation and the EU directive on packaging and packing waste. However, it is not clear whether this also accounts for residual plastic waste lost throughout the recycling process. Source: GOV UK (15 December 2020) Guidance: Packaging waste: producer responsibilities. [Available here](#).
- <sup>54</sup> EcoSurety (27 May 2021) Ecosurety boosts flexible plastic recycling in UK with FMCG and retail leaders. [Available here](#).
- <sup>55</sup> Information on Mars Wrigley [can be found here](#), Mondelez International [can be found here](#), Nestle [can be found here](#), PepsiCo [can be found here](#), and Unilever [can be found here](#), information on the top 10 food processing companies in 2019 [can be found here](#).
- <sup>56</sup> Checking Out on Plastics (2021) Environmental Investigation Agency and Greenpeace UK. Available [here](#).
- <sup>57</sup> EcoSurety (27 May 2021) Ecosurety boosts flexible plastic recycling in UK with FMCG and retail leaders. [Available here](#).
- <sup>58</sup> CITY AM (10 November 2021) Tory MP moonlighting as packaging lobby chair tried to soften environmental laws on plastic. [Available here](#).

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<sup>59</sup> GOV UK (14 March 2022) Register of Members' Financial Interests. [Available here](#). Mark Pawsey MP is employed 32 hours per month and receives a fee of £2,500 per month. He was still being [paid in 2021](#) and [in 2022](#). And in January 2021 during the government's Environmental Bill debate Mark Pawsey MP argued that the greater costs for packaging recycling and disposal to minimise their environmental harm should not fall on producers, also stating that "It is not the packaging manufacturer that is the polluter—people are. Source: CITY AM (10 November 2021) Tory MP moonlighting as packaging lobby chair tried to soften environmental laws on plastic. [Available here](#)

<sup>60</sup> Foodservice Packaging Association (last accessed 23 March 2022) Welcome to the Foodservice Packaging Association. [Available here](#).

<sup>61</sup> The [Foodservice Packaging Association News publications](#) shed light on their current policy stances. Out of the 32 positions statements available in March 2022, 11 were focused on the issue of littering, highlighting their view that people littering is what is contributing to the plastic pollution crisis rather than the mass consumption of plastic. Examples include: [In response to WRAP'S paper on the Key Requirements for Quantifying the Cost of Littered Packaging by Producers they state that](#) "The whole exercise comes across as punishing business for the behaviour of those who litter rather than seeking to eradicate it or change behaviours." [And in a response to a study from the University of Cadiz that](#) "We agree with the University of Cadiz scientists that pollution must be stopped at source by ensuring no items escape into the natural environment, be it on land or sea. This is down to every citizen as a consumer" and that "there is nothing wrong with the packaging per se but there is with the humans who litter."

<sup>62</sup> Footprint Sustainable Responsible Business (26 May 2022) Packaging firms push for policy pause. [Available here](#).

<sup>63</sup> Parliament UK (16 December 2020) Register Of All-Party Parliamentary Groups [as at 16 December 2020]. [Available here](#). Please note that in [2020](#), [2021](#) and [2022](#) the APPG for the Packaging Manufacturing Industry did not publish an income and expenditure statement relating to the AGM.

<sup>64</sup> Metal Packaging Manufacturers Association (last accessed 23 March 2022) APPG Archives. [Available here](#).

<sup>65</sup> The Packaging Federation (19 January 2021). Minutes of the "virtual meeting" of the APPG for the packaging manufacturing industry – APPG 57. [Available here](#).

<sup>66</sup> CITY AM (10 November 2021) Tory MP moonlighting as packaging lobby chair tried to soften environmental laws on plastic. [Available here](#)

<sup>67</sup> [On 15 June 2020](#) "I spent my working career supplying food service packaging items, and I see today as a pretty sad day. Having sold many straws and plastic stirrers in my working career, I find it of concern that if I supply a plastic drink stirrer I am guilty of an offence and would be liable on summary conviction to a fine. I think that is a pretty disappointing state to be in. I thank the Minister for the delay, because for many of the suppliers of these products, their customers have not been able to use the products as a consequence of the hospitality sector being shut down. The delay that she has introduced is very welcome.", on [15 June 2020](#) "Does my hon. Friend agree that plastic is a problem and waste is a problem, but people are also a problem? People are not disposing of these products appropriately and they are getting into the wrong place. Would an education process to get people to put the right product in the right box and get it recycled be part of her endeavour?" on [22 July 2021](#) "I am sure the Secretary of State was shocked to see the huge volumes of litter left around Wembley and London's west end after the Euro final. He referred earlier to extended producer responsibility for packaging. That seeks to put the blame for litter on manufacturers, making them responsible for the cost of the clean-up. Does he agree that this was all caused by illegal actions of the public, and while it is important to consider business responsibility, should the Government not also look to ensure that their citizens behave responsibly" on [15 October 2020](#) "It has been suggested that one way of reducing pollution is to make greater use of oxo-degradable plastic. This involves using an additive in conventional plastics that causes them to break down and fragment into microplastics that, in the marine environment, can be digested by organisms. In addition, oxo-degradable material in the waste stream is a contaminant and causes a reduction in the levels of recycling. Will the Minister commit the Government to acting on the call from the Ellen MacArthur Foundation and join the EU in banning the use of oxo-degradable plastic?". There has been at least one instance where Mark Pawsey MP made indirect reference to his secondary employment as FPA Chairman, [on 26 January 2021](#) "I speak as chairman of the all-party group on the packaging manufacturing industry, an important part of the UK economy with sales of £11 billion and 85,000 employees, representing 3% of the workforce, and I draw attention to my entry in the Register of Members' Financial Interests."



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<sup>68</sup> House of Commons Committee on Standards (26 April 2022) All-Party Parliamentary Groups: improving governance and regulation. [Available here](#).

<sup>69</sup> House of Commons Committee on Standards (24 May 2022) Standards Committee proposes new Code of Conduct for MPs. [Available here](#).

<sup>70</sup> UKRI (16 October 2020) UKRI funding puts UK at the forefront of plastic recycling. [Available here](#).

<sup>71</sup> UKRI (2 March 2022) Plastic packaging innovations receive £30 million boost from UKRI. [Available here](#).

<sup>72</sup> The Evening Standard (02 May 2019) Rebecca Pow MP: Plastic polluting manufacturers should pay, so we can have a greener future. [Available here](#).

<sup>73</sup> With Ecosurety (who manage the Flexibles Plastic Fund) citing that the Fund was created to meet the forthcoming UK plastic packaging tax obligation. Source EcoSurety (27 May 2021) Ecosurety boosts flexible plastic recycling in UK with FMCG and retail leaders. [Available here](#). And in February 2020 Jayplas recycling committed to opening [a £10 million plastic film recycling plant capable of handling up to 80,000 tonnes of plastic film a year](#) and in October 2021 announced plans to build another [£39 million plastics recycling plant that could process 75,000 tonnes of plastic waste film a year](#).

<sup>74</sup> Antonopoulos et al. (May 2021) Recycling of post-consumer plastic packaging waste in the EU: Recovery rates, material flows, and barriers. Journal of Waste Management. [Available here](#). And Circular (19 May 2021) We can no longer afford to ignore plastic film. [Available here](#).

<sup>75</sup> British Plastics Federation (last accessed 17 June 2022) Consistent Collections of Flexible Plastics. [Available here](#). And Morrisons (last accessed 23 March 2022) Morrisons to co-own world leading soft plastic recycling site in UK. [Available here](#).

<sup>76</sup> British Plastics Federation (last accessed 17 June 2022) Chemical Recycling 101. [Available here](#). And at times significant losses occur with each chemical recycling lifecycle, whereby virgin polymer plastics is still required. Studies show that "the evidence base for the significant adoption of chemical recycling technologies is limited, lacking detail and it remains unclear what role they might play. Source: Eunomia and the CHEM Trust (8 December 2020) Chemical Recycling: State of Play. [Available here](#).

<sup>77</sup> The Flexible Plastic Fund (last accessed 23 March 2022) FAQs. [Available here](#).

<sup>78</sup> The Ellen McArthur Foundation (last accessed 17 June 2022) Flexible Packaging: Moving away from single-use flexibles: direct elimination. [Available here](#).

<sup>79</sup> Ecotextile News (07 March 2022) EPR delayed in the UK with no new date set. [Available here](#).

<sup>80</sup> Business Green (11 February 2022) The UK's Deposit Return Scheme: Delays, devolution, and the case for going digital. [Available here](#).

<sup>81</sup> The Grocer (15 December 2021) Scotland deposit return scheme delayed until August 2023. [Available here](#).

<sup>82</sup> EIA (June 2021) The UK's Trade in Plastic Waste. [Available here](#). Please note, this should not result in increased incineration or landfilling of plastic waste, this is why an accompanying plastic reduction target is crucial.

<sup>83</sup> For more information, please refer to Environmental Investigation Agency (June 2021) The UK's Trade in Plastic Waste. [Available here](#).

<sup>84</sup> Environmental Investigation Agency and Greenpeace UK (January 2021) Checking Out on Plastics III. [Available here](#).

<sup>85</sup> Environmental Investigation Agency (February 2021) Checking Out Plastics Policy. [Available here](#).

<sup>86</sup>

Environmental Investigation Agency (February 2021) Checking Out Plastics Policy. [Available here](#).

<sup>87</sup> Weakening of the UK EPR for packaging scheme includes, [within the Government's recently published proposal](#), phasing in EPR from 2024, rather than 2023, only introducing modulated feed based on recyclability from 2025, the continuation of the current arrangements (PRN system) (however this may change), producers not paying the costs of managing business waste, not include litter payments to cover packaging in England,

<sup>88</sup> MRW (28 March 2022) Costs to producers cut by £1bn as business waste dropped from EPR. [Available here](#).