

What the EU can do to support the grocery retail sector in reducing packaging and plastic pollution:

POLICY BRIEFING



INTRODUCTION

There are a number of different measures to combat plastic pollution within the European Union and Member States, certain of which are currently in the process of being reviewed and updated.¹ However ever-growing usage of different plastic products and polymers² – including a myriad of single-use, non-recyclable and plastic alternatives – means further coordinated and more ambitious action is required.³

A key sector that has been part of the proliferation of unnecessary or single-use plastic items, like certain packaging formats, is the grocery retail sector.⁴

Three years on from the adoption of the Single-use Plastics Directive and with new work streams including the Sustainable Products Policy Initiative, implementation of the Circular Economy Action Plan and current review of the Packaging and Packaging Waste Directive and Waste Shipment Regulation – now is an opportune time for policymakers to introduce measures to reduce the continued proliferation of single-use plastics, such as packaging.

Over the last decade packaging waste generated within the European Union has increased from 161.6 kg per capita to 174 kg.⁵ Plastic is the most commonly used material for packaging, with an estimated 37% of food sold in the EU using plastic as a packaging material.⁶ Plastic is also the second largest packaging material in terms of tonnage – a total of 14.8 million tonnes of plastic packaging

waste was produced in 2018 alone (+15.3% increase since 2008)⁷ and these numbers are set to grow.⁸ The European appetite for plastic consumption is in part facilitated by the EU's possibility to export this waste for treatment to third countries, with 75% of 2017's exports⁹ being plastic packaging alone, meaning the consequences of rampant plastic consumption are often offset to third parties and countries to manage. Although there has been an overall continuous decrease in EU plastic waste exports since 2018, proportionally the EU is currently sending more of its waste to non-OECD countries, who are known to have even more overwhelmed waste treatment infrastructure and subsequently higher mismanagement rates.¹⁰

Certain EU grocery retailers may have plastic reduction targets in place.¹¹ However, the current pace of change within the entire industry is insufficient to meet the scale of the plastic pollution crisis.¹² For instance, the work undertaken by the Environmental Investigation Agency (EIA) and Greenpeace UK in their annual Checking Out on Plastics survey found that despite having company-level targets and varying levels of reduction, collectively UK supermarkets increased total volumes of plastic packaging by 1.2% between 2017 and 2019.¹³

Within this briefing, we put forward **five plastic policy positions** that can help drive progress in the EU, level the playing field in the grocery sector, and galvanise a green recovery as the region attempts to build back better.¹⁴

We urge policy-makers to support the following measures at EU and national level to assist the supermarket retail sector, and others, in achieving adequate plastic reduction.

1

PACKAGING REDUCTION TARGETS, WITH AN EMPHASIS ON SINGLE-USE PLASTICS

In addition to the Plastic Bags and Single-Use Plastics Directive's current objectives¹⁵ there is a need for binding overall plastic reduction targets both EU-wide and at the Member State level.

This should include a combination of packaging by unit, unnecessary weight (of a quality enabling recyclability), and form part of the soon-to-be revised Packaging and Packaging Waste Directive. At a minimum, this should include:

- a. Introducing at an absolute minimum an EU-wide target of a 25% reduction in plastic packaging use by 2025, increasing to 50% by 2030, within the Packaging and Packaging Waste Directive.
- b. That the above is complemented with an overall reduction target for packaging waste per material stream in order to avoid material substitution and reduce the overall quantity of packaging waste¹⁶ and phase out measures on avoidable packaging.
- c. Introducing bans on unnecessary application of packaging or overpackaging (e.g. wrapping of fruits and vegetables, plastic wrapping of a cardboard packaging), and for single-use packaging for which packaging-free or reusable alternatives are largely in place, by 2030.¹⁷ A recent example of this would be France's ban on plastic packaging of certain fruits and vegetables that came into force January 2022.¹⁸
- d. That these targets should be accompanied by the introduction of mandatory EU-wide harmonised reporting of plastic and packaging of the EU grocery retail sector to increase transparency.
- e. And that light-weighting (in the form of switching to lighter-weight plastic rendering it unrecyclable or simply making the packaging smaller without also addressing unnecessary components) and single-use material substitution are not considered primary methods in achieving the above targets.

BENEFITS OF SETTING REDUCTION TARGETS:

- Voluntary and non-binding targets may well be preferred by the grocery retail sector, since it allows companies the flexibility to adapt their performance according to internal priorities and external pressures. However, they have not been demonstrated to be effective. Differences in targets, baselines, data collation methodology and ambition – as well as levels of performance – vary across the sector, not only making the task of evaluating progress complex also creating an unequal and opaque picture of the overall state of play.
- Furthermore, despite being the EU's main policy focus,¹⁹ recycling and recyclability of packaging alone is not an adequate solution to the plastic pollution crisis. It has been estimated that only 9% of plastic made has ever been recycled²⁰ and with the EU potentially at risk of missing its current plastic packaging recycling targets,²¹ recycling is not the panacea for combatting plastic pollution. Moreover, plastic can only be recycled a finite number of times before it downgrades beyond use in functional applications making it at best one element of how the industry should be considering their long-term strategies for plastic reduction.
- In developing strategies, both retailers and policy makers should be aware that substitution to other single-use packaging material has been calculated as being significantly more expensive than elimination and reuse plastic system change scenarios²² as well as having its own environmental impacts, thus the policy instruments need to encourage overall packaging reduction, while recognising that plastic is particularly problematic.
- Binding plastic reduction targets will not only provide the opportunity to level the playing field but would also incentivise the spread of innovative solutions which are not yet practiced at such an economy of scale, which would also lessen the risks and unknowns about which retailers are concerned. Plastic reduction is needed within a short timeframe,²³ thus we encourage retailers to acknowledge the necessity of legal obligations mandating reduction in order to achieve this.

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9%

of plastic made has ever been recycled

2

PACKAGING REUSE TARGETS

Reusable packaging can largely contribute to achieving packaging reduction and waste prevention.

Therefore reduction targets should be complemented by reuse targets in the upcoming revision of the Packaging and Packaging Waste Directive:

- At an absolute minimum at least 25% of consumer packaging is reusable by 2025, increasing to 50% by 2030.²⁴ This in combination with specific product category 2030 targets such as 75% for household cleaning products, 75% for beverages and 50% for cosmetics.²⁵
- 100% of eat-in food and beverage packaging are reusable for the hotels, restaurants and cafes as well as 75% takeaway and delivery food and beverage by 2030.
- At least 50% of e-commerce packaging shipped within the EU should be reusable by 2030.
- That the publication of company action plans on reuse with a timeline which shows measurable and independently audited results form part of the above quantitative objectives.
- That the above is coupled with harmonised format and system standards, legalised durability requirements, as well as inclusion of criteria on rotation levels and efficient and safe reverse logistics and storage.²⁶
- And ultimately that Europe has also set itself the target to make all packaging reusable or recyclable by 2030 in the 2020 Circular Economy Action Plan.²⁷

CASE STUDY:

Packaging, especially single-use plastic packaging, has been touted as a miracle material allowing for the increased safety, durability, and protection for the products it contains.²⁸ However ever-increasing analysis and creation of reusable and refillable grocery retail systems demonstrate how alternatives are just as effective in providing products to consumers²⁹ and elimination and consumer reuse systems being more economical to implement compared to other plastic reduction measures.³⁰

Take the example of Loop, faced with the environmental issues stemming from single-use packaging and creating a circular economy business model, Loop, in partnership with a retailer, provides well-known household brands in zero-waste packaging – either in the form of a deposit-return home delivery service (like their previous partnership with Tesco in the UK, now with a focus on in-store)³¹ or instore (like their partnership with Carrefour in France).³²

In combination with the points raised above with regards to recyclability and material substitution, reusable packaging is key to facilitating the achievement of targets and defines the 'how' of plastic reduction.



At an absolute minimum at least

25%

of consumer packaging is reusable by 2025

3

DEPOSIT RETURN SCHEME

In order to achieve the current Single-Use Plastic Directive’s target of achieving 77% separate collection target for plastic bottles by 2025, increasing to 90% by 2029.³³ Deposit Return Schemes are the most effective and successful way to achieve true circularity for packaging (including drink containers), by giving consumers an incentive to return it and effectively closing the loop of materials. Member States need to implement harmonised Deposit Return Schemes that are:

- a. All-inclusive, so are designed to accept all container sizes and all materials (i.e., plastic, aluminium and glass at a minimum) but that this is coupled with strict requirements for the quality of the material to be collected together, so that closed-loop bottle-to-bottle recycling is still possible and allows for recycling to create food grade material when it comes to single-use plastic bottles.
- b. Creating a system whereby the introduction of reusable/refillable systems within the scheme is expected at a later date, coupled with the setting of a European and national targets of at least 75% refillable quota for beverage packaging by 2030.³⁴

- c. Designed so that they operate in harmony with Extended Producer Responsibility schemes.
- d. And crucially, that any scheme can and should be expanded to, in time, be used for reusable cups, food containers and other potential packaging types.

Need for a deposit return scheme

Over 41 billion plastic bottles, glass bottles and metal cans are littered in towns, cities and nature, ending up in rivers and oceans or in landfills or incinerators each year across 24 EU countries.³⁵

Despite some intense industry lobbying³⁶ trying to hamper Member State adoption of Deposit Return Schemes; in the past 4 years, 10 European governments took the decision to introduce or expand their national deposit return schemes (or are in the process of doing so)³⁷.

In fact, if put in place across Europe DRS could avoid the waste of 31 billion bottles and cans, including 22 billion plastic bottles. With that acknowledgement and in view of the new EU targets, European beverage producer federations started calling for the introduction of DRS in all European Member States.³⁸

Source: What we Waste Report, Reloop (2020)

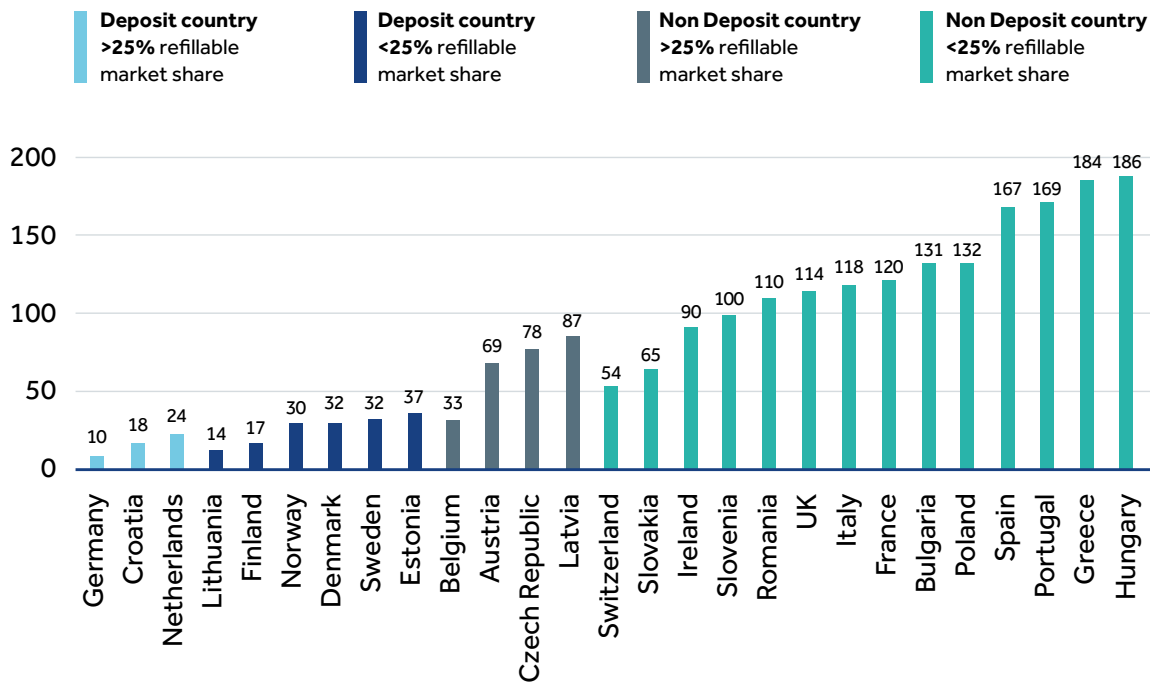


Figure: Single-use beverage containers wasted per capita, by country, 2017. Source: What We Waste Report, Reloop (2020). [Available here.](#)

4

EXTENDED PRODUCER RESPONSIBILITY

The EU requires that by the end of 2024, EU countries should ensure that Extended Producer Responsibility (EPR) schemes are established for all packaging.³⁹ There is also currently a 50% recycling target for plastic packaging by 2025.

In their assessment of current EPR essential requirements, the Commission confirmed that despite there being a reduction in the unit weight of packaging there has been an overall increase in the amount of packaging – and that plastics, flexible and composite packaging as well as bioplastics⁴⁰ and compostables were increasing in popularity.⁴¹ The recyclability (including the use of energy from waste), collection and treatment issues related to these packaging trends are concerning.

Producers, manufacturers and retailers not having to account for the true cost of the packaging placed on the market and externalising its impacts has facilitated the damaging increase and presence of plastics in Europe (and across the world), which in turn is creating a host of environmental, social and human health issues.⁴²

1. In line with the definition below, we encourage retailers to support that the new Extended Producer Responsibility (EPR) requirements are designed to increase reuse and reduction of packaging as well as recyclability, in line with the waste hierarchy. This should be achieved through a combination of reuse and reduction targets and modulation of fees to incentivise eco-design, reuse and reduction and penalise single-use packaging. Proceeds from producer fees can then be used to fund new reuse and refill systems and infrastructure, allowing the retail sector to take advantage of the economic opportunities of reuse.
2. That EPR schemes should be routinely independently verified and audited, including when voluntary and industry-led to ensure transparent, environmentally-sound best practice.⁴³

3. Specifically, we would like to draw attention to our recommendations with regards to the eco-modulation of EPR fees made within our Extended Producer Responsibility and Eco-modulation of Fees Report⁴⁴ which include:
 - a. Harmonisation of modulation criteria across Member States defined according to the waste hierarchy and bridging EU-wide eco-design criteria with modulation criteria.
 - b. That fee setting covers the real end-of-life costs as well as social and environmental costs, ensures fair competition amongst PROs in competitive EPR schemes and influences consumer choices.
 - c. That cost coverage also includes waste prevention measures, and that revenues are earmarked for circular economy innovation and social economy actors.
 - d. That online platforms are used to tackle both free-riding and improve data availability.
 - e. Making EPR and eco-modulation a key part of the policy mix, including changes made to the Ecodesign Directive.

Extended Producer Responsibility Definition

Extended Producer Responsibility (or Producer Responsibility) is a regulated system and policy whereby the full net costs of managing a product (in this case, plastic packaging) from production to waste treatment is placed on the businesses that produce and use said product, rather than taxpayers.

This can be implemented in a manner which will also have an impact on how a product is designed, encouraging recyclability and reuse if EPR design means that they will become more financially interesting options for these businesses, which now have the added costs of being responsible for what they make.

There are different definitions of what this system could look like; we see EPR schemes aligning with the 'polluter pays principle', full cost recovery and the OECD's full lifecycle definitions. For instance, to date businesses producing and using plastic packaging are not paying the full price of the harmful economic, environmental and human health impacts plastic packaging causes throughout its entire lifecycle.

A successful EPR scheme is a framework that internalises and builds in all these costs throughout the production, use and discarding process.



5

LIMIT THE IMPACT OF THE PLASTIC WASTE TRADE

The use and placement on the market of unrecyclable and hard to recycle plastic packaging (either as a result of polymer blends, structure or not being economically viable) by retailers results in negative impacts further down the lifecycle of these products.

European recycling infrastructure can't treat the high level and structure of plastic packaging currently consumed, and so the export of plastic waste to third countries occurs.⁴⁵ There are subsequently instances of mismanagement due to overwhelmed destination country infrastructure and illegal shipments⁴⁶, resulting in environmental and human health harm. In addition to the above measures, the reduction of retailer plastic packaging exports impacting other regions is strongly encouraged through the adoption of the following recommendations:

1. The revision and adoption of the EU Waste Shipment Regulation to include a ban on plastic waste exports outside the European Union.⁴⁷
2. That the Basel Convention is fully implemented within the EU, via the transposition of the plastic waste amendments ensuring prior informed consent for all intra-EU plastic waste shipments.
3. That these two measures are accompanied by a series of other interrelated policy measures, including establishing a clear distinction between mechanical recycling and other kind of recovery for treatment operations, setting a European-wide threshold for waste contamination of 0.5%, and that publicly accessible access to waste trade data is ensured.
4. This is coupled with an EU-wide moratorium on new incineration and landfilling capacity. This is coupled with an EU-wide moratorium on new incineration and landfilling capacity.⁴⁸

Treating European plastic waste in the form of exports is convenient for Member States⁴⁹, cheaper but ultimately a form of greenwashing⁵⁰, as this practice is externalising many costs that Europe is responsible for. In addition, despite this, it seems the EU target of 50% of all plastic packaging should be recycled by 2025 will still not be met.⁵¹

This non-circular loophole is further facilitated by the illegal shipments of plastic waste.⁵² The illegal EU waste trade annual revenue ranges between 4 and 15 billion euros (midpoint figure of 9.5 billion).⁵³ Least transboundary movement of waste would facilitate transparency and reduces the risk of illegal shipments.⁵⁴

By taking full responsibility for the treatment of its plastic waste, the EU will reduce the risk of plastic waste leakage⁵⁶, enhance circularity and operate within Europe's finite recycling sector- also facilitating reduction and subsequently paving the way for reuse.⁵⁷

Impact of EU waste exports in receiving countries

A 2021 Greenpeace investigation documented instances of illegal dumping of non-recyclable European plastic waste, which includes approximately 400 containers with non-recyclable or difficult to recycle plastic waste from Germany in Turkish ports which can no longer be processed.

For reference, between 2016 and 2020 German plastic waste exports to Turkey increased more than sevenfold, amounting to 136,000 tons in 2020. Turkey was the largest export country for EU Member State plastic waste.⁵⁸

The amount of EU plastic waste exports to Turkey has since reduced, since Turkey put in place importing restrictions in the summer of 2021⁵⁹, but this serves to show that this isn't simply a social justice and environmental issue,⁶⁰ but also impacts the health of communities where this plastic waste is being exported to, with receiving countries subsequently trying to restrict the occurrence of these exports.⁶¹



Between 2012 – 2017
approximately
30%
of all EU plastic
packaging waste
destined for recycling
was exported⁵⁵

CONCLUSIONS

Growing awareness and attention on reducing the impact of packaging, especially that of single-use plastic packaging, is not a trend and the impacts are already severe, accumulating and will continue to do so exponentially without increased ambition. We urge supermarkets to listen to their client base and policy-makers to listen to their citizens.

As of December 2019, and the latest Eurobarometer report, European citizens considered growth in waste as being one their the most important environmental issues (alongside climate change and air pollution).



2/3

of Europeans agree that their consumption habits adversely affect the environment (**68%**).

More than

4 in 5

respondents (**85%**) worried about the impact on their health of chemicals present in everyday products.⁶³

9 in 10

respondents (**89%**) agreeing that they are worried about the environmental impact of everyday products made of plastic.⁶²

We strongly urge for the establishment of policy infrastructure that will provide the milestones, legislative stability and framework that would support retailers whilst they make these much needed changes. Proactively engaging and uniting behind these five plastic policy positions will facilitate this necessary and inevitable transition.

ENDNOTES

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#breakfreefromplastic

The #breakfreefromplastic Movement is a global movement envisioning a future free from plastic pollution. Since its launch in 2016, more than 11,000 organizations and individual supporters from across the world have joined the movement to demand massive reductions in single-use plastics and to push for lasting solutions to the plastic pollution crisis.

RETHINK PLASTIC

Rethink Plastic, part of the Break Free From Plastic movement, is an alliance of leading European NGOs, representing thousands of active groups, supporters and citizens in every EU Member State.



We investigate and campaign against environmental crime and abuse including work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution. www.eia-international.org

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