

Missing The Mark | #breakfreefromplastic

"By 2040, current government and industry commitments are likely to reduce annual plastic leakage into the ocean by only 7% (±1 percent) relative to business as usual. Our results indicate that a far greater scale of action at the system level will be required to address the challenge of plastic pollution."

- The Pew Charitable Trusts, Breaking the Plastic Wave

"A reduction of plastic production—through elimination, the expansion of consumer reuse options, or new delivery models—is the most attractive solution from environmental, economic, and social perspectives. It offers the biggest reduction in plastic pollution, often represents a net savings, and provides the highest mitigation opportunity in greenhouse gas (GHG) emissions."²

- The Pew Charitable Trusts, Breaking the Plastic Wave

"There has been limited progress... on reducing the need for single-use packaging altogether. Progress on shifting toward reusable packaging is limited, and elimination efforts remain focused on a relatively small set of materials and formats."

- Ellen MacArthur Foundation, The Global Commitment 2020 Progress Report

The Pew Charitable Trusts. 2020. p.9. Breaking the Plastic Wave: A Comprehensive Assessment of Pathways Towards Stopping Ocean Plastic Pollution. Accessed 28 May 2021. https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_distilledreport.pdf

² Ibid. p.9. Accessed 28 May 2021.

³ Ellen MacArthur Foundation. 2020. p.9. The Global Commitment 2020 Progress Report. Accessed 28 May 2021. https://www.ellenmacarthurfoundation.org/assets/downloads/Global-Commitment-2020-Progress-Report.pdf

Missing The Mark

Unveiling corporate false solutions to the plastic pollution crisis

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ABOUT BREAK FREE FROM PLASTIC

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. BFFP member organizations and individuals share the common values of environmental protection and social justice, and work together through a holistic approach in order to bring about systemic change under the #breakfreefromplastic core pillars. This means tackling plastic pollution across the whole plastics value chain – from extraction to disposal – focusing on prevention rather than cure and providing effective solutions.

breakfreefromplastic.org

Trash collected by volunteers, sorted by brand.

Introduction

Fast moving consumer goods companies (FMCG) hold a significant share of responsibility for the global plastic pollution crisis. FMCG companies have responded to sustained public criticism by announcing a wide range of projects to tackle their plastic footprint yet these projects have so far come under little scrutiny. This report aims to cut through the fanfare surrounding high profile corporate projects and the stream of positive press releases. By tracking, categorising and counting the supposed plastic pollution solution projects of sev-



en of the world's top plastic polluters⁴ we can start to understand how serious companies are about solving plastic pollution. To measure progress going forward, we have ranked the companies based on their solutions portfolio with the intent of repeating the exercise in the future.

The growing use of plastic for single-use products has caused an environmental and social crisis around the world. Plastic causes severe negative impacts throughout its lifecycle, from the moment the raw materials are extracted and continuing until disposal, whether it is burned, dumped or lost into the environment. There is no adequate way of disposing of plastic that is free from environmental damage, and the current recycling system is woefully inadequate. Only 9% of plastic ever produced since the 1950s has been recycled⁵, and only very limited types of plastic can be recycled in an economical way. Plastic

⁴ According to Break Free From Plastic's annual brand audit reports.

Geyer, R., Jambeck, J., Law, K., 2017. Production, Use and Fate of all Plastics Ever Made. Science Advances Vol. 3, no. 7 https://advances.sciencemag.org/content/3/7/e1700782

production is set to quadruple by 2050, and one of the main drivers of this is fast moving consumer goods companies and single-use packaging. Break Free From Plastic has been tracking the brands found on plastic pollution in the environment around the world since 2018 and every year the same multinational FMCG companies are found to be the biggest plastic polluters. Each of these companies has made public statements acknowledging the need to address plastic pollution, and all of them have commitments and set targets based on plastic recycling, recycled content and/or plastic reduction. Most of the commitments are made through the Ellen MacArthur Foundation's New Plastic Economy Global Commitment, with companies reporting annual progress towards meeting the commitments. While the top-line numbers can be scrutinised, there is little information on the specific projects that aim to help the companies achieve the targets.

This report ranks the top seven polluting FMCG companies identified in Break Free From Plastic's 2020 brand audit report on their plastic pollution solutions projects from 2018 through April 2021. Break Free From Plastic also reviewed projects by alliances and group initiatives in which the top seven polluting

FMCG companies are involved. Two findings stand out from the review of projects. First, reuse-based alternative delivery systems are not receiving the priority attention that is warranted, given the outsized potential they have to achieve a significant reduction in plastic pollution, mitigate greenhouse gas emissions and yield net savings. Second, the top seven polluting FMCG companies and their alliances and group initiatives are instead prioritizing projects that Break Free From Plastic and many others consider to be false solutions to the plastic pollution crisis.

6 Pew, 2020. Breaking the Plastic Wave, p. 9. Accessed 27 May 2021. https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_distilledreport.pdf

b Plastic production is set to quadruple by 2050, and one of the main drivers of this is fast moving consumer goods companies and single-use packaging.

This report highlights the main trends that emerge when analysing a set of 265 projects out of a total of 350 projects that were uncovered through desk research. The projects are classified as reuse-based alternative product delivery systems or various categories of false solutions. We explore each category and analyzed specific examples in greater detail. The FMCGs are scored and ranked on their projects in a systematic manner to compare company initiatives, and to enable tracking on a semi-regular basis moving forward.

The top seven polluting FMCGs identified in the 2020 Break Free From Plastic brand audit are, starting with the number one top polluter: The Coca-Cola Company, PepsiCo, Nestlé, Unilever, Mars, Inc., Mondelez International and Procter & Gamble.















The alliances and group initiatives included are:

Alliance to End Plastic Waste

Circulate Capital

Closed Loop Partners

PREVENT Waste Alliance

Sustainable Packaging Coalition

American Beverage Association

Materials Recovery for the Future, and

PRAISE (Packaging and Recycling Association for Indonesia Sustainable Environment).

Methodology & Limitations

For this report, we found and reviewed more than 350 projects undertaken by the top seven polluting FMCGs from January 2018 to April 2021 and eliminated 85 of them as out of project scope. We chose 2018 as the starting point as this was when the majority of the target companies launched new commitments aiming to reduce plastic pollution. We looked at two bodies of projects: Those initiated directly by each FMCG company (called "direct projects" in this report), and those undertaken by alliances and group initiatives in which the top seven polluting FMCG companies are actively participating (called "indirect projects" in the report). We found 214 direct projects from the companies and 51 indirect projects from the alliances and group initiatives that could be classified as one of the two categories we were assessing: reuse-based alternative delivery systems, and false solutions as defined by Break Free From Plastic.

To find the projects included in our assessment, during the six-week desk research period Break Free From Plastic examined the websites, publications and social media feeds of the top seven FMCGs, and the eight alliances and group initiatives, plus trade publications and news sites. Six of the FMCGs are signatories to the Ellen MacArthur Foundation's Global Commitment, and for these six we also reviewed their 2020 Global Commitment progress reports. Because the FMCG companies do not publish comprehensive lists of their projects in an easy-to-find single location on their websites, it is impossible to ensure that all projects undertaken by the FMCGs between January 2018 and April 2021 were found. Break Free From Plastic also sent a survey to the top seven FMCG companies requesting information about their commitments and targets related to reuse-based alternative delivery systems, as well as a full list of their projects. Of the six FMCGs that responded to the survey, only three provided a list of projects as requested, and these were only partial lists. In addition, Break Free From Plastic surveyed its core membership to crowdsource information gathering and received responses from 21 countries.

Plastic sachets and pouches with little recycling value.

To guide the overall assessment, five experts from Break Free From Plastic's core membership (one each from Southeast Asia, Latin America, Africa, Europe and North America) developed key criteria to inform the assessment and ranking. Three additional experts from the core membership (one each from South Asia, Southeast Asia and North America) reviewed the corporate ranking system and guided its finalization.

To arrive at the final set of 265 projects included, Break Free From Plastic excluded projects that consist primarily of eliminating unnecessary plastic, as



well as those that consisted of materials substitution, including bio-based and compostable plastics and plastic types that companies claim are recyclable. Eliminating unnecessary plastic is important, and many brands are doing this on a large scale by 'lightweighting' or making plastic thinner or packaging smaller. It often happens without being announced to the public and was out of scope for this project. This study focuses on pilots and location-based projects as these are the most under scrutinised. On the reuse/refill/alternative delivery side of the equation, we focused on projects that feature reuse-based alternative delivery systems that enable the delivery of FMCG products without single-use materials of any kind. We did not include individual refill products that required the consumer to purchase the refills in single use plastic to fill up more durable containers. These do not represent a systems change and still rely on single use packaging, just in smaller quantities. To develop the primary project type categories we used throughout the analysis and which appear throughout this report, Break Free From Plastic took an iterative approach, reviewing and sorting the projects multiple times to test potential project type categories until we arrived at an accurate yet versatile set that worked across all 265 of the diverse projects included in this analysis. The categories are defined in the table below.

CATEGORY	SUB-CATEGORY	HOW WE DEFINED IT
Reuse-based	Pilots	Pilot schemes that happened in limited locations for a limited time scale or only one or two products. Often this was only in one store, in one town, or several malls but only for a few months
alternative delivery systems	Expanded pilots	Pilot schemes that are longer term, are trialled across a wider product range, or have clearly communicated plans to expand across a region or product range
	Deployed at scale	Reuse or alternative delivery systems that are in use across at least one market, or across multiple product types. These are not pilots but changes intended to be permanent.
False solutions projects	Unproven-at-scale technology	These are novel technologies that are technically feasible or currently operational on a small scale, but have yet to be proven to be economically and technically feasible on a large scale. Includes chemical recycling of plastic waste to new plastic, and other technologies designed to tackle multilayered sachets.
	Third party collect/ dispose (including flexibles collect/ dispose and plastic neutrality)	This is where the FMCG company pays another entity to collect a certain amount of waste from the environment and recycle or dispose of it, often as part of their voluntary extended producer responsibility obligations. The collectors are often informal waste pickers, and the disposal method is often burning. Plastic offsetting credits, projects to collect flexible, multilayered sachets and plastic neutrality claims are based on third party collection and disposal and are included in this category.
	False narrative	This is where public claims are made or implied by the company messaging around a project that are problematic, such as 'beach clean ups are a solution', or 'packaging made from plastic collected from the ocean is solving pollution'.
	Announced-then- nothing	When we have been unable to find any information on a project other than the initial press release announcement, it has been put into this category. Also includes projects that were launched but quickly failed.



A review of the 'solution' projects and initiatives from the FMCG companies and alliances revealed two concerning issues:

- 1 A lack of ambition and prioritization of alternative product delivery methods at a systemic level that would allow for a dramatic reduction in the use of single-use plastic
- 2 An over-abundance of investment in and prioritization of false solutions which allow companies to continue the business-as-usual reliance on single-use plastic packaging.

Following are the project counts per FMCG company and for the most active alliances and group initiatives that include the top seven polluting FMCGs as members/participants.

How are top companies addressing the plastic pollution crisis?

DIRECT PROJECTS

TOTAL PROJECTS: 214

Re-use based alternative delivery systems

25 pilots 7 expanded pilots

6 deployed-at-scale



solutions projects

24 unproven-at-scale technology

73 third-party collect/dispose

67 false narrative

12 announced-then-nothing



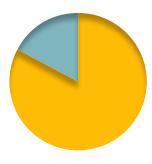
Total Projects 52

Re-use based delivery systems

4 pilots

1 expanded pilot

4 deployed-at-scale



False solutions projects

4 unproven-at-scale technology

18 third-party collect/dispose

17 false narrative

4 announced-then-nothing



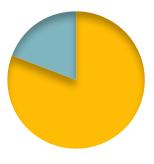
Total Projects 26

Re-use based delivery systems

2 pilots

1 expanded pilot

2 deployed-at-scale



False solutions projects

3 unproven-at-scale technology

8 third-party collect/dispose

7 false narrative

3 announced-then-nothing



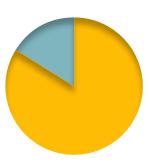
Total Projects 43

Re-use based delivery systems

5 pilots

2 expanded pilots

0 deployed-at-scale



False solutions projects

8 unproven-at-scale technology

21 third-party collect/dispose

6 false narrative

1 announced-then-nothing



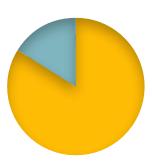
Total Projects **42**

Re-use based delivery systems

9 pilots

2 expanded pilots

0 deployed-at-scale



31 False solutions projects

4 unproven-at-scale technology

16 third-party collect/dispose

8 false narrative

3 announced-then-nothing



Total Projects

Re-use based delivery system

1 pilot

• expanded pilots

• deployed-at-scale



False solutions projects

3 unproven-at-scale technology

1 third-party collect/dispose

4 false narrative



Total Projects 14 Re-use based delivery system

1 pilot

0 expanded pilots

• deployed-at-scale



False solutions projects

1 unproven-at-scale technology

6 third-party collect/dispose

6 false narrative



Re-use based delivery systems

3 pilots

1 expanded pilots

0 deployed-at-scale



24 False solutions projects

1 unproven-at-scale technology

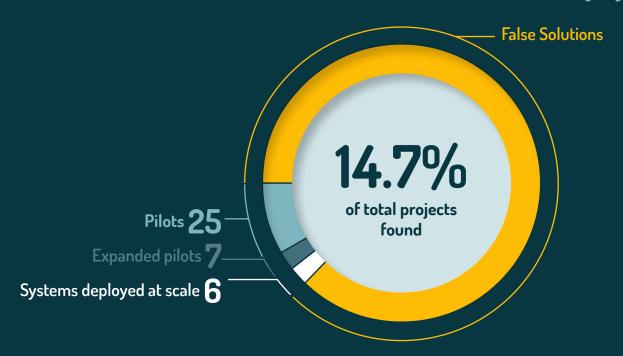
3 third-party collect/dispose

19 false narrative

1 announced-then-nothing

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	Alliance	o knd ste stic Waste ciculate	Closed Lo	or presenti	Me PRAST	danesa PRO) Sustainad	e aging Coalition	Severals Materials Ref
	PepsiCo, P&G	Coke, PepsiCo, P&G, Unilever	Coke, PepsiCo, Nestlé, Unilever, P&G	Coke, Nestlé	Coke, Nestlé, Unilever	Coke, PepsiCo, Nestlé, Unilever, Mars, Mondelez, P&G	Coke, PepsiCo	PepsiCo, Nestlé, Mars, Mondelez, P&G, Unilever
Total Found : 51	24	8	11	2	2	2	1	1
Reuse-based alternative delivery systems = 1 (1 pilot)	0	0	1	0	0	0	0	0
False solutions projects = 50	24	8	10	2	2	2	1	1
14 unproven- at-scale technology	3	2	6	0	0	2	0	1
10 flexibles collect/dispose	4	3	3	0	0	0	0	0
2 "plastics neutral"	0	0	0	2	0	0	0	0
18 false narrative	12	3	0	0	2	0	1	0
6 announced- then-nothing	5	0	1	0	0	0	0	0

Reuse-Based Alternative Delivery Systems⁷



This phrase, here and throughout the rest of this report, refers to reuse-based alternative delivery systems that enable the delivery of FMCG products without the use of single-use materials of any kind.

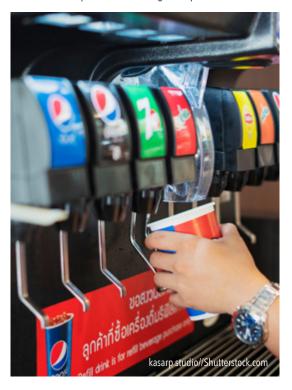
ANALYSIS

The six projects in which reuse-based alternative delivery systems are deployed at scale sound promising, but on closer inspection, five of these six are either pre-existing systems (e.g., PepsiCo's SodaStream) or upgrades to FMCG companies' pre-existing systems (beverage and water dispensers by Coca-Cola and PepsiCo used in restaurants), and drink dispensers have been widely used for years. The sixth is Coca-Cola's universal bottle, deployed across seven Latin American countries. While this is an admirable example of a new reuse-based alternative delivery system deployed at scale, it is important to temper praise of this project. Coca-Cola has been actively dismantling its pre-existing reuse-based beverage delivery systems globally for more than a decade. The remaining reuse-based alternative delivery systems projects are small pilots and expansions of those pilots that are not yet deployed at scale. The level of ambition in this category is underwhelming at best.

⁸ Greenpeace, 2017 The Case Against Coca-Cola. Accessed 28 May 2021. https://storage.googleapis.com/gpuk-static/legacy/the-case-against-coca-cola.pdf

Many of the re-use based delivery systems we found were simply upgrades to existing systems, not replacements for single use plastics.

Secondly, only three of the 39 projects in this category have occurred in the five countries that have been identified as having the highest leakage of plastic to the ocean⁹ (China, Indonesia, Philippines, Vietnam, Thailand), and two of those five projects (Vietnam, Philippines) were of short duration. Although the third (Indonesia) is somewhat larger, it is located in a single packaging-free boutique shop in South Jakarta.¹⁰ None of these projects, all by Unilever, have communicated any expansion plans. The FMCG companies and alliances regularly cite these five countries as having the highest leakage as justification for developing end-of-pipe false solutions projects there. The vast majority of the



companies' efforts on reuse-based alternative delivery systems occur in the global north, with the exception of Coca-Cola's universal bottle. The online reusable groceries initiative Loop¹¹ gets a lot of positive press and is a pioneer of the concept, yet this targets mid- to high-end consumers with disposable incomes and is therefore not very accessible or inclusive of those on lower incomes.

To better understand the overall under-performance of FMCG companies in this solution category, we need look no further than the commitments and time-bound targets that are currently in wide use across the sector, which is soft on reuse-based alternative delivery systems. For example, nested amidst a set of otherwise ambitious, specific, time-bound commitments and targets, Ellen MacArthur Foundation's Global Commitment has this: "Moving from single use to reuse models." As a result, the 2020 Progress Reports submitted by six of the seven top polluting FMCG companies who are signatories to the Commitment are equally as vague about their progress towards this goal:¹²

Jambeck, J. et. al, 2015. Plastic waste inputs from land into the ocean. Science, Vol. 347, Issue 6223, pp. 768-771 https://science.sciencemag.org/content/347/6223/768

¹⁰ Indonesia in-store refill station launches with 11 Unilever brands (March 6, 2020). Accessed 28 May 2021. https://www.unilever.com/news/news-and-features/Feature-article/2020/indonesia-in-store-refill-station-launches-with-11-unilever-brands.html

¹¹ Loop US online store. Accessed 3 June 2021 https://loopstore.com

¹² Ellen MacArthur Foundation Global Commitment 2020 Progress Reports. Accessed 28 May 2021. https://www.ellenmacarthurfoundation.org/resources/apply/global-commitment-progress-report/organisation-reports

The Coca-Cola Company: vague statements, no numerical targets attached

PepsiCo: none reported

Nestlé: 20 pilots

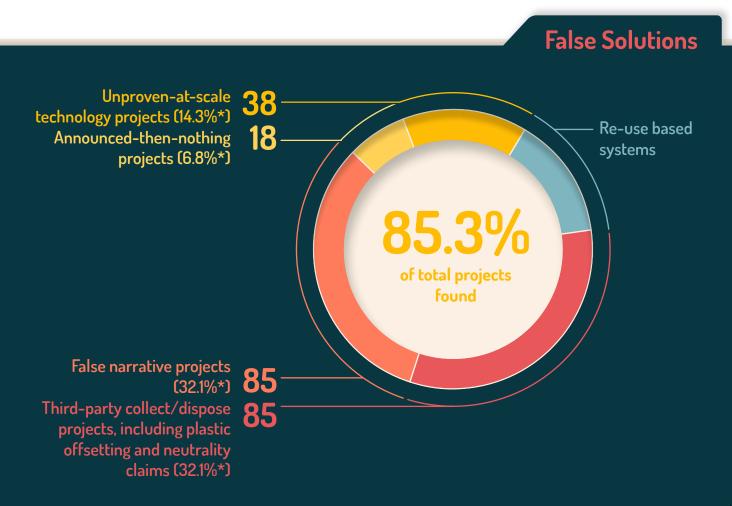
Unilever: "piloting reuse models," no numerical targets attached

Mars, Inc.: 10 pilots

Mondelez International: none reported

The seventh top polluting FMCG company, Procter & Gamble, does not participate in the Global Commitment and has no 2025 targets at all (the company has targets for 2030 instead).

The top seven polluting FMCG companies are not making meaningful commitments at a level that is remotely commensurate with this solution category's outsized importance as a proven true solution to plastic pollution. The lack of ambitious targets means that the companies are not being held properly accountable for achieving specific, time-bound progress on delivery system re-invention.



ANALYSIS



Unproven-at-scale technology projects

Break Free From Plastic found 38 of these projects. Frequently called "advanced recycling" or "chemical recycling" by the industry, these projects feature technologies that have not yet been proven at scale and have environmental and social consequences of a level currently unquantified. Yet the FMCG companies, alliances and group initiatives talk about and invest in them as if they were already operational at scale and had little or no negative impacts. According to Breaking the Plastic Wave, "Chemical conversion has not been proven at scale. Compared with mechanical recycling, it has higher costs, energy requirements and greenhouse gas emissions."13 The all-out push to solve the flexible plastic and sachets problem via unproven-at-scale technologies also includes investments in new technology to enable automated sorting of the ever-increasing variety of plastic packaging types coming onto the market that have no value. Top plastic polluter Mars states plainly on the company website that the company's ability to hit its 2025 targets for both absolute reduction in virgin plastic use and recycled content is "dependent on advancement of chemical recycling at pace and scale."14 In fact, the quest to secure a steady supply of clean reprocessed plastic made out of plastic waste through the process of chemical recycling appears to be a major driver for the costly rush to finance unproven-at-scale technologies.

Why is this a false solution?

Chemical recycling or conversion refers to a number of different processes where plastic polymers are broken down and reformed. This term encompasses the process of converting plastic waste to new plastic and converting plastic into fuel. There's little independently verified information available on how much energy these technologies use, what chemicals are used or toxic waste generated, or whether these technologies can deliver at scale and at a viable cost¹⁵. Chemically transforming plastic into fuel is not recycling, it's simply another way to burn fossil fuel.

- 13 The Pew Charitable Trusts. 2020. p.23. Breaking the Plastic Wave. Accessed 28 May 2021. https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_distilledreport.pdf
- Mars 2025 Sustainable Plastic Packaging Plan. Accessed 26 May 2021. https://www.mars.com/sustainability-plan/healthy-planet/sustainable-packaging
- Rollinson, A., Oladejo, J. (2020). Chemical Recycling: Status, Sustainability, and Environmental Impacts. Global Alliance 15 for Incinerator Alternatives. https://www.no-burn.org/cr-technical-assessment/

A number of these projects, including significant investments in physical infrastructure, have ended in scandal. In one example, unproven-at-scale technology company Loop Industries imploded in October 2020 when an independent investigation revealed that the entire operation was no more than "smoke and mirrors." ¹⁶ The investigation report says that Coca-Cola terminated its agreement with Loop Industries in the wake of the scandal. ¹⁷ It is unclear if PepsiCo has terminated its agreement with the enterprise.

Even more recently, PureCycle, which purchased a license to use "proprietary" chemical recycling technology from Procter & Gamble, fell apart in May 2021. An independent investigation revealed that the founders structured its public offering such that they and other sponsors could walk away with roughly US\$90 million before the company generated any revenue.¹8 PureCycle had been featured in investment firm Closed Loop Partners' 2020 Impact Report which cited the value of the enterprise as US\$1.2 billion.¹9 Top plastic polluter Nestlé formed a partnership with PureCycle in February 2021 in hopes that the nascent company would provide food-grade soft plastic to help the FMCG hit its 2025 recyclability target.

Meanwhile, the alliances and group initiatives are moving forward with these and other unproven-at-scale technology projects. The Alliance to End Plastic Waste recently put out a call for proposals offering US\$1 million-US\$20 million for project proposals with innovative solutions in chemical recycling technologies for hard-to-recycle plastics.²⁰ Closed Loop Partners has promised to release an Investor and Partnership Roadmap for Advanced Recycling in summer 2021 "that illustrates how to scale advanced recycling sustainably in North America."

- Hindenburg Research, 13 October 2020. Loop Industries: Former Employees and Plastics Experts Blow The Whistle On This "Recycled" Smoke And Mirrors Show. Accessed 26 May 2021. https://hindenburgresearch.com/loop/
- 17 Coca-Cola terminates agreement with Loop Industries. Plastics Today. 12 November 2020. Accessed 28 May 2021. https://www.plasticstoday.com/advanced-recycling/coca-cola-terminates-agreement-loop-industries
- Hindenburg Research, 6 May 2021. "PureCycle: The Latest Zero-Revenue ESG SPAC Charade, Sponsored by the Worst of Wall Street." Accessed 26 May 2021. https://hindenburgresearch.com/purecycle/
- 19 Closed Loop Partners. 2020 Impact Report. Accessed 26 May 2021. https://www.closedlooppartners.com/wp-content/uploads/2021/02/Closed-Loop-Partners-2020-Impact-Report-3.pdf
- Alliance to End Plastic Waste, 10 February 2021. Accessed 26 May 2021. "The Alliance to End Plastic Waste Calls for Submissions for Recycling Technologies." https://endplasticwaste.org/en/news/the-alliance-to-end-plastic-waste-calls-for-submissions-for-recycling-technologies
- 21 Closed Loop Partners website. Accessed 26 May 2021. https://www.closedlooppartners.com/advanced-recycling-investor-roadmap/

A tremendous amount of time, attention and finance are going into this project type, and the recent troubles with favored enterprises do not bode well for the outcome. Regardless, the Break Free From Plastic movement does not support this false solution even if it does become technologically and economically feasible due to the unknown carbon emissions, toxic chemicals used and other pollutants emitted²².

2 Third-party collect/dispose projects

These projects are undertaken by FMCG companies to satisfy their voluntary commitments to fulfill their producer responsibilities. They normally consist of a company or 'plastic credit agency' contracting local entities to collect and dispose of an amount of plastic pollution equivalent to what the FMCG company put on the market as plastic packaging in a given geography. The collection is often undertaken by informal waste workers, and the plastic is often disposed of by burning it, often in cement kilns. Break Free From Plastic found 85 of these projects. There are three aspects of collect/dispose projects that are particularly concerning:

Sachets and other non-recyclable plastic collect/dispose

Sachets and flexible plastics are poor quality and hard to recycle by mechanical processes, making them such low value materials that informal waste workers will not collect them. In the Global South, sachets and flexible plastics form a huge part of the plastic pollution problem and companies are scrambling to find a way to recycle them to meet their own commitments. A total of 54 of these projects involve sending all or part of the plastic pollution collected on behalf of FMCGs to cement kilns, waste-to-energy facilities, refuse-derived fuel plants, chemical recycling plants and/or entities that downcycle plastic pollution into furniture, road materials, or construction materials. As Ellen MacArthur Foundation states in the Global Commitment Definitions, plasticsto-energy and plastics-to-fuel "cannot be considered as recycling (according to ISO definitions), nor as part of a circular economy."23 These projects make up the majority of the projects Break Free From Plastic found in Southeast

²² Break Free From Plastic Movement Position on Chemical Recycling. Accessed 3 June 2021. https://www.breakfreefromplastic.org/2020/06/22/bffp-position-on-chemical-recycling/

²³ Ellen MacArthur Foundation, 2020. p.11. Global Commitment Definitions. Accessed 28 May 2021. https://www.ellenmacarthurfoundation.org/assets/downloads/Global-Commitment_Definitions_2020-1.pdf

Asia, South Asia and Africa²⁴. Waste-to-energy and the other disposal methods featured in this set of 54 projects are false solutions to plastic pollution as they do nothing to reduce the amount of plastic being produced, and create a multitude of social and environmental issues.

Why are these false solutions?

Cement kilns, waste-to-energy plants and refuse derived

fuel are all just other ways of burning fossil fuels. Each one of these takes plastic waste and burns it to produce energy, and each one is being used in so-called plastic pollution solution projects. Burning plastic is dirty, generating toxic ash along with other types of air and water pollution²⁵. The industrial plants to burn the waste are also often located in lower-income communities, who are impacted by these pollutants and by heavy trucks transporting the waste to be burnt. These three processes are often included in sustainability projects as a way to "process" waste collected, but burning plastic is never a sustainable option. Waste-to-energy is also regularly called a "renewable energy," but in fact it uses more energy than is produced.²⁶

Downcycling is when plastic waste is mechanically recycled into an item that can't then be recycled again. Often high value PET bottles, which are easy to recycle into other high value bottles, are instead turned into fleeces, other polyester fabrics, park benches or construction materials. Low value plastic waste is also sometimes turned into road surfaces or construction bricks. These things typically will have to be burned or landfilled at the end of their life, and will generate microplastics before then. While sometimes called a "solution" to plastic pollution, downcycling is actually just delaying plastic disposal.

- Break Free From Plastic is very concerned that Circulate Capital's 2019 Investor Handbook points investors to "opportunities" that include medium-to-large financings for new waste-to-energy facilities in South and Southeast Asia. See: Circulate Capital, 2019. Investing to reduce plastic pollution in South & Southeast Asia: A Handbook for Action. p. 9. Accessed 28 May 2021. https://lb495b75-5735-42b1-9df1-035d91de0b66.filesusr.com/ugd/77554d 3bb19c2c7b75435f8d2817edfc15a28f.pdf
- Global Alliance for Incinerator Alternatives, 2019. Pollution and Health Impacts of Waste to Energy Incineration https://www.no-burn.org/wp-content/uploads/Pollution-Health_final-Nov-14-2019.pdf
- Global Alliance for Incinerator Alternatives, 2018. Facts about Waste To Energy Incinerators https://www.no-burn.org/wp-content/uploads/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf

"Plastics neutrality"

25 of these third-party collect/dispose projects are being used by industry players to claim "plastics neutrality" and promote the associated false solution of "plastic offset credit" schemes and "plastic neutral" certification. A full 19 of these are Nestlé's projects, and an additional two are projects by PREVENT Waste Alliance, which counts Nestlé and Coca-Cola as members and where both of these top polluting FMCG companies serve on the Closing Plastic Cycles Working Group. Nestlé is particularly keen on these projects, proclaiming the company's plastic neutrality achievements for the press on a regular basis.²⁷ These projects enable FMCG companies to easily offload their producer responsibilities onto others in the Global South in exchange for plastic offset credits or official-sounding documents that purport to verify that the FMCG company has officially achieved "plastics neutrality."

In the Philippines, at least four of the top seven polluting FMCG companies (Nestlé, PepsiCo, Mondelez, Unilever) have engaged the nonprofit Plastic Credit Exchange. It describes itself as "the 1st Global Non-profit Plastic Offset Program" and proclaims that their Plastic Neutral Certified standard is now a dominant global standard.²⁸ The range of processing technologies that Plastic Credit Exchange relies on to dispose of the plastic pollution collected on behalf of Nestlé and the others includes plastics-to-fuel and chemical recycling, as well as other problematic emerging technologies.²⁹

Why is this a false solution?

Plastic neutrality and plastic offsetting is a new concept modeled on the idea of 'carbon neutrality'. An entity sells credits by collecting plastic waste that otherwise might be left in the environment and a company or individual buys enough credits to offset their plastic footprint or a part of it. This means a company can be producing huge amounts of single-use plastic but claim plastic neutrality

- Committing to plastic neutrality:Nestlé PH recovers equivalent amount of plastic waste used in packaging. Inquirer. net. 4 September 2020. Accessed 28 May 2021. https://business.inquirer.net/306409/committing-to-plastic-neutrality-Nestlé-ph-recovers-equivalent-amount-of-plastic-waste-used-in-packaging.
- 28 Plastic Credit Exchange website. Accessed 28 May 2021. https://www.plasticcreditexchange.com/
- 29 Plastic Credit Exchange, 2020. The Plastic Pollution Reduction Standard. Accessed 26 May 2021. https://529916b1-7406-445e-8d0c-e21a1af3254f.filesusr.com/ugd/12f051_040cf8f11313486780fe3af8a9d08cf1.pdf

because they have paid enough money to someone else to collect waste. Often the plastic is collected by informal waste workers, and the collected plastic is burned in cement kilns. Carbon neutrality and carbon offsets are false solutions to the climate crisis³⁰, and the same is true for plastic neutrality. No plastic is actually reduced, and how much plastic is actually diverted from the environment is hard to confirm. Either way, burning plastic is never a solution.

Improving Informal Waste Worker Livelihoods

45 of the 85 third-party collect/dispose projects communicate in their promotional materials that informal waste worker livelihoods and working conditions will be improved through the project. However, none of these projects provide information regarding how the promised improvements for workers will be measured, and they fail to provide data-based evidence that worker improvements have actually been achieved through the project. Further, none of them provide specific information about how the promised worker improvements will be sustained after the project ends.

Why is this a false solution?

Informal waste workers work in unsafe, unhealthy conditions for very low pay, and if FMCG companies and alliances say they are going to improve informal waste workers lives, Break Free From Plastic expects them to back up these claims with metrics, a measurement plan, a final accounting of actual positive impacts achieved for worker livelihoods and working conditions, and specific information about how any improvements achieved will be sustained beyond the end of the project.

Based on these observations, it is clear to Break Free From Plastic that formalizing "plastic neutral" certification and/or "plastic credit offset" mechanisms will validate the claims of some FMCGs that handing off their producer responsibilities to third parties absolves them of that responsibility. In fact, if "plastic neutral" certification and "plastic credit offset" mechanisms are normalized and scaled

Friends of the Earth International, 2021. Chasing Carbon Unicorns: the deception of carbon markets and net zero https://www.foei.org/resources/publications/chasing-carbon-unicorns-carbon-markets-net-zero-report

up, millions of informal waste pickers around the world will become locked into collecting worthless plastic pollution that will then be disposed of via a host of "second life" technologies, most of which are known to generate negative environmental and social impacts.

False narrative projects

Break Free From Plastic found 85 projects that convey messages that are misleading or problematic. These include:

- bad individual behavior is responsible for plastic pollution;
- we can cleanup and/or recycle our way out of the problem;
- flexibles and hard-to-recycle plastics are essential;
- unproven-at-scale technologies will solve the problem; and/or
- plastic pollution is a downstream waste problem and efforts to solve it should focus on cleaning up.

Cleanups

Among these are 23 plastic pollution cleanup projects. Cleanups are problematic because they embody the message that we can clean up and recycle our way out of the problem. Breaking the Plastic Wave published by The Pew Charitable Trusts says, "Although scaling up recycling is critically important, stopping plastic pollution by capturing all plastic materials in the recycling process is neither technically nor financially feasible." Unless plastic pollution cleanups include a brand audit to record which companies produced the plastic waste, they convey the message that cleaning up is part of the solution and it is the individual's responsibility to do it. It simply deflects attention away from the concept of prevention and reduction at source.

In a number of cleanup projects targeted at consumers, at least two of the top seven polluting FMCG companies are using beach cleanups and the plastic pollution collected to create short-run "ocean plastic" packaging prototypes and limited edition runs of flagship products in ocean plastic bottles. These projects convey the message that individuals can solve ocean plastic pollution by participating in cleanups, recycling and purchasing boutique products

The Pew Charitable Trusts. 2020. Breaking the Plastic Wave: A Comprehensive Assessment of Pathways Towards Stopping Ocean Plastic Pollution. p.20. Accessed 27 May 2021. https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_distilledreport.pdf

labeled as being made from recycled ocean plastic pollution. For example, Procter & Gamble's 2019 Citizenship Report includes the company's limited edition Head & Shoulders bottles, made in part from ocean plastic pollution sourced from local cleanups, had been successfully replicated by the company in "more than 10 countries" and that the total number sold globally had surpassed one million. The bottle and its messaging were so successful, Procter & Gamble went on to create three million Fairy Ocean Bottles in Europe, a limited edition Joy ocean plastic bottle in Japan and three limited edition collections for its Herbal Essences brand hair care products. In 2018 Coca-Cola launched its Mares Circulares project, a massive cleanup of 84 beaches and 12 ports along the Mediterranean coast. Out of this pollution, the company created a small run of 300 petite Coca-Cola bottles made out of food-grade recycled ocean plastic pollution that the company says it used "to show the transformative potential of new recycling techniques."

Why is this a false solution?

Cleanups do nothing to prevent plastic waste entering the environment in the first place, and most ocean plastic can never be recovered because it's too small or too remote and deep. Beach cleanups are mainly cosmetic, with more plastic being washed onto the beach with the next tide. Cleanups give a false sense of 'doing something' to people, and often convey the message that it is individual responsibility for causing and solving plastic pollution, instead of the companies that produce plastic in the first place.

Innovation Challenges and Business Accelerators

20 projects consist of industry-backed innovation challenges and business accelerators sponsored by the top seven polluting FMCG companies and alliances. No fewer than 19 of these 20 projects frame the problem as being primarily a downstream one that can be solved through a combination of

- 32 Procter & Gamble. 2019 Citizenship Report. p.142. Accessed 27 May 2021. https://us.pg.com/citizenship2019/pdf/citizenship_report_2019_full.pdf
- 33 Ibid. p.142. Accessed 27 May 2021.
- 34 Coca-Cola España website. "La primera botella hecha con plástico reciclado procedente de basura marina." Accessed 26 May 2021. https://www.cocacolaespana.es/sostenibilidad/medioambiente/envases/primera-botella-plastico-marino-reciclado

processing technologies that have yet to be invented, and new ways to enable a "second life" for low-value plastics, particularly flexible sachets. The FMCGs, alliances and group initiatives are promoting and running these projects all over the world, targeting young entrepreneurs, start-ups and growth-stage enterprises and offering cash awards, business development training and mentorship. These high profile projects are systematically directing the attention of the world's entrepreneurial talent away from where it needs to be: achieving an absolute reduction in plastic packaging. Although these innovation challenges sometimes mention reuse/refill as a possible option for contestants to consider, at least so far the finalists and winners have won for pitching innovations that are almost entirely focused on the downstream end of the problem.³⁵

Announced-then-nothing projects

Break Free From Plastic found 18 projects that were loudly announced by the top seven polluting FMCG companies, alliances and group initiatives and then rarely if ever heard from again. It appears that for quite a few of these projects, nothing actually happened on the project subsequent to the initial announcement. Examples include the Alliance to End Plastic Waste's African Parks project,

which the Alliance said would tackle waste in 17 protected areas in 11 countries. Although this project was announced in June 2020,36 Break Free From Plastic found no reference to any subsequent on-the-ground activity on either the Alliance to End Plastic Waste or the African Parks websites.³⁷ The same is true for Procter & Gamble's sanitary waste collection and recovery project in India, announced in late 2018. According to a 2019 Wall Street

66 It appears that for quite a few of these projects, nothing actually happened on the project subsequent to the initial announcement. ??

- Alliance to End Plastic Waste. 2020. Progress Report 2020. p.15. Accessed 28 May 2021. https://endplasticwaste.org/en/news/ alliance-to-end-plastic-waste-releases-2020-progress-report
- Alliance to End Plastic Waste Press Release. African Parks Partner to Improve Waste Management in Protected Areas Across the Continent. 22 June 2020. Accessed 28 May 2021. https:// endplasticwaste.org/en/news/african-parks-partner-to-improvewaste-management-in-protected-areas-across-the-continent
- African Parks website. Search results for "plastic pollution". Accessed 28 May 2021. https://www.africanparks.org/search/ node?keys=plastic%20pollution

Journal article about the project, "P&G pledged to open a recycling facility in India in 2019, but the effort has stalled. A Proctor & Gamble spokesman said the company doesn't have a date by which the India recycling facility will open."³⁸

Other projects that Break Free From Plastic found did indeed launch after the initial announcement but then suddenly disappeared. For example, in early 2018 PepsiCo launched Drinkfinity, a new product intended to promote reuse that featured a reusable bottle that customers could fill with water and customize by inserting a "signature" flavor pod into the inside lid and shaking up the drink. PepsiCo provided mailers for customers to use to return the pods to Loop Industries for recycling. The investigation of Loop Industries referenced above includes evidence that the pods were instead shipped to a town in Vermont, where they were disposed of in empty barrels.³⁹ In another example, just a few months after the Alliance to End Plastic Waste announced its Renew Oceans project along the Ganges River in India, plastic waste traps purchased for the project were found abandoned outside the Renew Oceans project office, which appeared to be empty. According to Reuters, after going silent for months, the project was finally officially terminated, "partly because of coronavirus-related shutdowns and partly because of 'other implementation challenges', an alliance spokesperson told Reuters."40 The fact these projects fail underlines that these pilots and innovative technologies were not solutions to the issue. The lack of transparency is problematic considering the positive media attention these projects receive when announced.

Why is this a false solution?

These projects receive significant media coverage when announced, but there is rarely any announcement or media coverage of the projects failure or end. The initial media fanfare gives a misleading impression to the public about what FMCG companies are doing to solve their plastic pollution. As we have seen in this report, they are actually doing little meaningful actions that will reduce their plastic footprints.

- 38 Chaudhuri, Saabira. "P&G Faces Backlash Over Diaper, Sanitary Waste" (April 3, 2019). Accessed 26 May 2021. https://www.wsj.com/articles/p-g-faces-backlash-over-diaper-sanitary-waste-11554283800
- 39 Hindenburg Research. "Loop Industries: Former Employees and Plastics Experts Blow The Whistle On This "Recycled" Smoke And Mirrors Show".13 October 2020. Accessed 26 May 2021. https://hindenburgresearch.com/loop/
- Big Oil's flagship plastic waste project sinks on the Ganges. Reuters. January 18, 2021, Accessed 26 May 2021. https://www.reuters.com/article/idUSKBN29N028

Scoring the FMCG Companies on Their Projects

To score the FMCGs on their projects, both direct and indirect, each project was assigned a point value of one and was assigned to one of the project types. Each project was counted only once to arrive at the raw total project count for each FMCG company direct project.

To integrate the alliance and group initiative projects into the FMCG companies' direct projects, Break Free From Plastic assigned each of the companies that are part of an alliance or initiative one point for each of that alliance's projects. These alliance project points were then added to the point totals under the corresponding project type. For example, a project for the Alliance to End Plastic Waste would score one point each for both PepsiCo and Proctor and Gamble, because they both participate in that alliance. This is to ensure all companies that are involved in an alliance are held accountable.

Once all the indirect projects were assigned to the companies, Break Free From Plastic added up the reuse-based systems project points to arrive at the FMCG company's total reuse-based systems raw score. We did the same for the false solutions project points to arrive at the FMCG's total false solutions raw score. These two raw scores added together are the FMCG's total overall raw score. The final step consisted of expressing each of the two category raw scores as a percentage of the FMCG's total raw score. This makes it possible to compare the FMCGs on the relative emphasis they are placing on a fundamental redesign of product delivery versus false solutions.

The end result is a numerical score for reuse-based systems and a numerical score for false solutions for each FMCG company, and these two numbers add up to 100 for every one of the FMCGs.

The Ranking

FINAL PERCENTAGES

COKE	PEPSICO	NESTLÉ	UNILEVER	MARS	MONDELEZ	P&G	
Reuse-based alternative delivery systems							
12.8	8.2	13.1	18.2	8.3	5.9	6.8	
False Solutions							
87.2	91.8	86.9	81.8	91.7	94.1	93.2	

To rank the FMCG companies on their projects, Break Free From Plastic focused on their false solutions scores because even before integrating the indirect projects, all seven top polluting FMCGs had a much higher percentage of false solutions projects as compared to their percentage of reuse-based systems projects. The higher the false solutions score, the worse the FMCG is likely to be doing, though this is not to undermine the promise and value of reuse-based solutions already being carried out by the said FMCGs.

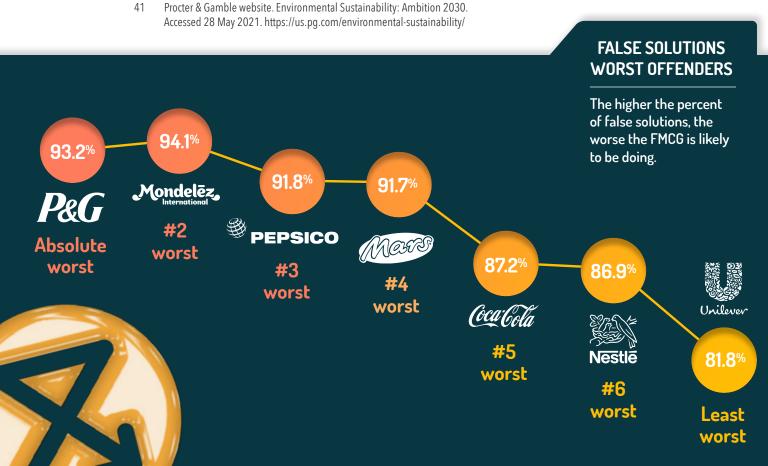
Break Free From Plastic surveyed the seven top polluting FMCG companies as part of the research phase of this report and had planned to use the company survey responses to two of the core survey questions as a way to add the all-important dimension of commitments and targets to our scoring system. The survey asked:

- 1. [If you have a company-wide target for absolute reduction of virgin plastic use by 2025], what percentage of this absolute reduction do you plan to achieve through reuse/refill/packaging-free methods, and
- Has your company set a company-wide target for the percentage of annual revenue that will be generated from products delivered via reuse/refill/ packaging-free methods in 2025, and if yes, please provide details.

Of the six top polluting FMCG companies that responded to the survey in writing, only Coca-Cola, Mondelez International and Unilever answered both of these questions more or less directly, and in each instance, the answers were that they have no such targets. The other three survey respondents (PepsiCo, Mars, Procter

& Gamble) did not answer these two questions. As a result, Break Free From Plastic decided not to include their answers to these two core questions in the scoring. However, Break Free From Plastic did take the other targets that the companies reported in the survey, the Global Commitment Progress Reports and the FMCG companies' websites into consideration before finalizing the ranking order indicated by the false solutions scores presented in the final scores table above.

Although Mondelez International has the highest false solution score in the table, Mondelez International is among the six out of seven top polluting FMCGs that have a specific, time-bound absolute virgin plastic reduction target for 2025. The other top polluting FMCG (Procter & Gamble) is close to Mondelez International on scoring and has an absolute reduction target for 2030, but not 2025. This, along with other factors discussed below, justifies bumping them up one level in the ranking and lands them first position for the designation of Absolute Worst in Break Free From Plastic's first false solutions ranking. The rest of the ranking follows the order of the final false solutions scores in the preceding table.



1 Absolute Worst

Pecce Procter & Gamble: Beyond its refusal to play ball in setting specific time-bound targets for 2025, Procter & Gamble is the least transparent of the seven top polluting FMCGs, and the company devotes a significant portion of its public-facing "solutions" work to false solution cleanups with no brand audit. The fact that the company has been turning ocean plastic pollution and beach cleanups into a money-making marketing stunt with its sequence of plastic bottles made from ocean plastic pollution is shocking. Although the company has created a number of reuse/refill packaging for selected individual products, it has made no publicly disclosed effort to rethink its product delivery systems at a systemic level.

2 Second Worst

Mondelez International: Mondelez has taken very little action Mondelēz, on reuse beyond its initial contribution of four biscuit types to the first Loop Platform. Six of its 14 total direct projects are sending some or all of the plastic pollution collected on the company's behalf to cement kilns and downcycling operations. In addition, with the recent launch of the company's Sustainable Futures impact investing platform to incubate, finance and support sustainability ventures, 42 Mondelez has positioned itself as a broker between investors and enterprises that the company views as sustainable. Among the first ventures chosen is an NGO in India that will set up an enterprise to downcycle multi-layered plastic packaging into board for multiple uses.⁴³ As noted above, downcycling is a false solution, and Mondelez's choice of this enterprise as an example of what the company means by "sustainability" makes Break Free From Plastic question their understanding of the term. If the venture described above is emblematic of the kind of enterprises that Mondelez is prioritizing for investors, this may be an early warning sign that Mondelez will direct investors' attention to enterprises that address the downstream end of the plastic pollution problem and away from enterprises that seek to eliminate the problem at its source,

⁴² Mondelez Sustainable Futures website. Accessed 28 May 2021. https://www.mondelezinternational.com/About-Us/ Sustainable-Futures

⁴³ Mondelez Press Release. 18 February 2021. Accessed 28 May 2021. https://ir.mondelezinternational.com/news-releases/news-release-details/mondelez-international-launches-sustainable-futures-advance

before it can begin. Finally, of the six companies with overall plastic reduction targets for 2025, the company has the least ambitious overall plastic reduction target, committing to achieving a paltry 5 percent reduction in overall virgin plastic use by 2025.

3 Third Worst

PEPSICO: PepsiCo: PepsiCo is a core partner in six of the eight alliances and group initiatives included in this report, and three of these (Alliance to End Plastic Waste, Closed Loop Partners and Circulate Capital) are driving a full 42 of the 50 total false solutions projects we found by alliances and group initiatives that the top seven polluting FMCGs are part of. Eleven of these false solutions projects involve unproven-at-scale technologies, 10 are flexible plastic and sachet collect/dispose projects, and 15 are false narrative projects. PepsiCo plays a leadership role in these groups and is accountable for all of these false solutions projects.

4 Fourth Worst

Mars: Mars is slow to take meaningful action on reuse-based alternative delivery systems, instead seemingly waiting for more generously financed FMCGs, alliances and initiatives to invest their way to a magic bullet solution for flexibles. Although Mars is not a major participant across the alliances and group initiatives covered here, the company co-chairs the Consumer Goods Forum Plastic Waste Coalition of Action, which features as a key project on the coalition's webpage a chemical recycling workstream that 'is working to scale up advanced recycling, especially for flexible packaging. It also engages with key stakeholders to ensure broad support and send a strong demand signal for advanced recycling to investors and upstream suppliers."4445

⁴⁴ Consumer Good Forum Plastic Waste Coalition for Action Key Projects. Accessed 28 May 2021. https://www.theconsumergoodsforum.com/environmental-sustainability/plastic-waste/key-projects/

This coalition came to Break Free From Plastic's attention after the primary research for this report closed, so the projects of this coalition are not included the universe of projects Break Free From Plastic used as the basis for this report. All seven of the polluting FMCGs are members of this coalition under Mars' co-leadership

Given that the only reuse activity Break Free From Plastic sees from this company is its token participation on the Loop Platform in only one market and its trumpeting of the bulk M&Ms dispensers that have been featured in the company's flagship M&Ms stores since the 1990s, Mars has yet to make much effort on reuse-based alternative delivery systems.

5 Fifth Worst

Coca-Cola: Coca-Cola is second only to Procter & Gamble in the pervasiveness of its false narrative projects, and it has more "announced-then-nothing" projects than any other top seven polluter. Coca-Cola cheers its universal plastic bottle breakthrough in Latin America while continuing to dismantle the company's formerly prevalent reuse-based product delivery systems. 46 Coca-Cola's 2020 Business and ESG Report reveals that despite the new universal bottle, refillable plastic bottles made up just 1.6% of its overall packaging mix in 2020, the same figure that is reported for 2018. Refillable glass bottles comprised 9.3% of the company's total 2020 packaging mix, down from 11.7% in 2018. 47 Coca-Cola is also a strong proponent of unproven-at-scale technologies with four such projects included in Break Free From Plastic's assessment and scoring.

6 Sixth Worst

Nestlé: The only reason Nestlé is not higher up in Break Free From Plastic's Absolute Worst ranking is that the company did not participate in some of the most project-active alliances and group initiatives included here. Nestlé's ongoing efforts to propagate and normalize "plastic neutrality" and the associated false solutions of "plastic neutral certified" and "plastic offset credit" schemes, however, is a significant cause for concern. There is little oversight or transparency on the treatment of the informal waste workers who collect waste for these projects, and there is a high risk of exploitative conditions and remuneration. Instead of investing in plastic credits, Nestlé should focus on making their packaging truly recyclable or reusable.

⁴⁶ Greenpeace, 2017 The Case Against Coca-Cola. Accessed 28 May 2021. https://storage.googleapis.com/gpuk-static/legacy/the-case-against-coca-cola.pdf

⁴⁷ Coca-Cola 2020 Business and ESG Report, p. 70. Accessed 25 May 2021. https://d1io3yog0oux5.cloudfront.net/cocacolacompany/files/pages/cocacolacompany/db/761/description/coca-cola-business-environmental-social-governance-report-2020.pdf

7 Least Worst



Unilever: Unilever is clearly making the biggest effort on reuse-based alternative delivery systems, and the company is the only top seven polluting FMCG company to pilot these systems in some of the highest

leakage geographies. In addition, Unilever has the most ambitious absolute reduction target, which commits the company to halving the amount of virgin plastics it puts on the market by 2025. However, Unilever's motto, "less plastic, better plastic, no plastic" rings less true when viewed in relation to the company's third-party collect/dispose projects included in Break Free From Plastic's final project data set for this report. In 12 of 16 projects of this type, Unilever's local waste collection partners are sending some or all of the plastic pollution collected on the company's behalf to cement kilns and refuse-derived fuel facilities. Furthermore, Break Free From Plastic members and supporters, especially those living and working in Southeast Asia, deserve an honest and immediate update on the status of Unilever's CreaSolv project in Indonesia, given the central role this project plays in Unilever's solution strategy for the sachets and other flexibles that make up a disproportionate amount of the plastic pollution leaking into the ocean in the region.

Darmawan, L. Not Just a Waste Solution, RDF Becomes Low Emission Renewable Energy (title translated from Indonesian). MongaBay. 6 March 2021. Accessed 28 May 2021. https://www.mongabay.co.id/2021/03/06/tak-sekadar-solusi-sampah-rdf-jadi-energi-terbarukan-rendah-emisi/

Call to Action

As emphasized in *Breaking the Plastic Wave*, "The next two years are pivotal if key milestones are to be achieved by 2025."⁴⁹ It's time for the FMCG companies to turn off the tap on plastic pollution. The top seven polluting FMCG companies, and the entire sector that they represent, must dramatically increase their ambition, attention and investment in reuse-based alternative delivery systems that deliver these company's products without generating single-use packaging waste, rather than addressing the problem after it occurs.

Procter & Gamble, Mondelez International, PepsiCo, Mars, Inc., The Coca-Cola Company, Nestlé and Unilever are each in the driver's seat on decisions that result in the plastic packaging they put on the market. These companies' business models, and those of their counterparts across the packaged goods sector, are among the root causes and drivers of plastic pollution. There is no

excuse for their uninspiring performance on reuse-based product delivery systems. These seven top polluting FMCG companies' current logistic chains are built for the purpose of delivering products enclosed in single-use packaging. The entire system must be rethought and redesigned. Collectively, these seven companies generate more than \$370 billion in revenue each year. Consider the potential if these companies collaborated to direct funds towards real, proven solutions instead of wasting their money on marketing

The Pew Charitable Trusts. 2020. p. 10. Breaking the Plastic Wave: A Comprehensive Assessment of Pathways Toward Stopping Ocean Plastic Pollution. Accessed 28 May 2021. https://www.pewtrusts.org/-/media/assets/2020/10/breakingtheplasticwave_distilledreport.pdf.

seven companies generate more than \$370 billion in revenue each year. Consider the potential if these companies collaborated to direct funds towards real, proven solutions instead of wasting their money on marketing campaigns and other distractions. ??

campaigns and other distractions.

According to systems experts consulted for this report, FMCG companies can transform their product delivery systems and value chains at speed and achieve optimum across-the-board sustainability results if they collaborate with each other to pilot and scale new value chains that feature shared components. These include common digital standards, shared distributed infrastructure, shared forward and reverse logistics, standardized containers when packaging is required, and shared cleaning and sanitation services, among others. Engaging diverse stakeholders along the entire value chain--from CEOs to civil

companies'
business models,
and those of their
counterparts
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pollution. ??

society to informal waste workers and more--is also essential for creating new reuse-based product delivery systems and value chains that work for all.

In order to drive the FMCG companies in the right direction, the first essential step is to establish a new commitment focused entirely on reuse-based product delivery systems and packaging-as-a-service business models. This commitment should be accompanied by ambitious, specific and time-bound targets and a requirement to report annually on progress toward achieving them. This new commitment should also include language ensuring that the FMCGs pilot and scale this work consistently across all markets. Landscapes filled with waste-to-energy, chemical recycling and plastics-to-fuel plants in the global south are not acceptable "solutions" to plastic pollution. They are false solutions, and Break Free From Plastic's vision for a just, equitable and sustainable future for all does not include them, nor any of the other false solutions elaborated in this report.

In closing, Break Free From Plastic would like to share just transition principles that we expect the FMCG companies and others to embrace as core guiding principles.

Break Free From Plastic's Principles for a Just Transition

- Prioritize health for people and the planet.
- 2 Invest in true solutions, not false ones.
- 3 Replace single-use with sustainable systems.
- 4 Demonstrate transparency and accountability at every step.
- **5** Engage impacted communities.
- 6 Transition workers to stable jobs including training.
- 7 Ensure that products delivered via new systems are affordable and accessible to all.

When the top seven polluting FMCG companies fully commit to boldly pursue this true solution pathway and step into true leadership, the Break Free From Plastic movement, composed of more than 11,000 organizations and individual supporters, is here to help.

JUNE 2021



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