THE CONSUMER LENS ON PACKAGING 2021

CONSUMERS INTERNATIONAL

COMING TOGETHER FOR CHANGE

ABOUT CONSUMERS INTERNATIONAL

Consumers International is the membership organisation for consumer groups around the world.

We believe in a world where everyone has access to safe and sustainable goods and services. We bring together over 200 member organisations in more than 100 countries to empower and champion the rights of consumers everywhere. We are their voice in international policy-making forums and the global marketplace to ensure they are treated safely, fairly and honestly.

We are resolutely independent, unconstrained by businesses or political parties. We work in partnership and exercise our influence with integrity, tenacity and passion to deliver tangible results.

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CONTENTS

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EXECUTIVE SNAPSHOT

Packaging is a constant part of daily life for all consumers. Developments in the packaging industry have hugely benefitted the consumer, allowing for fresh and portable products. However, the rise of single-use packaging, especially that made from plastic, is having disastrous effects on the environment and our health[1]. As a result, consumers are demanding sustainable choices and they are growing in number. 74% of consumers in Europe, the United States, and South America are willing to pay more for sustainable packaging[2]. But alone, this is not enough – they need to be empowered and engaged – the marketplace needs to change.

From February to March 2021 nine Consumers International members in nine countries conducted a global assessment of the recyclability of packaging and effectiveness of labelling for 11 popular global household products. The research intended to explore and present a snapshot of the consumer experience in each of these countries when buying and attempting to recycle everyday household goods. The research was conducted quickly and efficiently across markets using a methodology that is easily scalable. This scalability will allow consumer advocates to regularly support and check the global recycling system.

The research found that consumers in all nine countries are unable to easily recycle all of the products assessed in practice; misleading, unclear, and confusing labelling on all of the products limited consumer choice at purchase and at point of recycling; and best practice in sustainable packaging, labelling information and recycling infrastructure varied across countries.

The research concludes with a series of key takeaways that suggest marketplace actors must work together in a complex system to meet commitments towards sustainability; an unequal level of burden is currently placed on consumers; and lack of equal access to recyclable packaging and infrastructure contributes to preventing consumers from making sustainable choices. Finally, the research presents a series of questions for further research and opportunities for all key actors to improve the marketplace experience for consumers.

1 McKinsey & Company website, https://www.mckinsey.com/industries/paper-forest-products-and-packaging/our-insights/the-drive-toward-sustainability-in-packaging-beyond-the-quick-wins

2 Trivium Packaging website, https://triviumpackaging.com/news/150

SECTION 1: OBJECTIVES AND RESEARCH METHODOLOGY

The following section outlines the parameters of the research, the consumer advocacy organisations involved, and the products tested. It describes the methodology followed and the implications and importance of 'recycled in practice'.

This research focuses specifically on the recyclability of packaging and the effectiveness of labelling. We note the complex nature of the whole system and the importance of understanding tackling packaging waste through the 7 Rs model of waste management (replace, rethink, refuse, reduce, reuse, recycle and repair)[3].

OBJECTIVES

Inspired by Which? research in 2018, 2019 and 2020[4], the research was led by nine of Consumers International's 200 members in India, the United Kingdom, Brazil, Australia, New Zealand, Portugal, France, Malaysia, and Hong Kong.

Together, these countries represent around 1.8 billion consumers[5]. These countries were chosen on the basis of coverage across multiple regions of the world and where consumer advocates were able to conduct a snapshot during a global pandemic.

The 11 household products, detailed in the table below, were chosen as the same or similar product was widely available in all nine countries. They are produced by eight of the 30 largest global food and beverage companies in terms of revenue in 2020[6].

Figure 1: List of products and companies selected for this research

PRODUCT	COMPANY
Nescafé Original Jar	Nestlé
Toblerone	Mondelez International
Pringles	Kellogg's
Coca-Cola Mini/Normal Can Pack	The Coca-Cola Company
Nutella Hazelnut Spread with Cocoa	The Ferrero Group
Heinz Chili Sauce/Tomato Ketchup	Kraft Heinz
Dove Body Wash	Unilever
Whiskas Adult/Junior Wet Cat Food	Mars
San Pellegrino Sparkling Water	Nestlé
M&M Peanut Chocolate	Mars
Kit Kat	Nestlé

3 Consumers International website, https://www.consumersinternational.org/media/361519/7rs-model-of-waste-management-1.jpg
4 Which? website, https://www.which.co.uk/news/2018/07/up-to-29-of-supermarket-packaging-is-not-recyclable-which-finds/
https://www.which.co.uk/news/2019/06/almost-half-of-supermarket-packaging-isnt-easily-recyclable-which-finds/
https://www.which.co.uk/news/2020/09/not-yet-recycled-the-grocery-brands-with-a-packaging-problem/
5 Worldometer website, https://www.worldometers.info/world-population/population-by-country/
6 Food Engineering website, https://www.foodengineeringmag.com/2020-top-100-food-beverage-companies

METHODOLOGY

The research was conducted by consumer advocates in each country between February and March 2021, with each following the same methodology. The research considered that the size, exact product name and packaging may differ between countries. However, given the scope of the project and the methodology used, the differences were managed to prevent a significant impact on the results.

The assessment in each country considered three aspects of product packaging: recyclability in practice, packaging recyclability, clarity of labelling on recyclability. The first of these is important because it considers the full journey of recyclability. Each country sought the advice of an independent waste efficiency expert to validate findings.

Figure 2: Detailed overview of methodology

RECYCLABILITY IN PRACTICE	PACKAGING	LABELLING
1. Recycled in the household/ kerbside 2. Only recyclable at external collection point 3. Not easily recyclable in practice*	1. Proportion of packaging weight in each recyclability category 2. Proportion of total number of packaging pieces in each recyclability category	1. Information about how to dispose of packaging 2. Information on recycled content in packaging

*Note: 'In practice' can be defined as an existing collection, sorting and recycling system in place that actually recycles the packaging i.e. it is not just a theoretical possibility[7]

Following the assessment, we worked with consumer advocacy experts from our nine member organisations in each country to understand the national recycling infrastructure and consumer attitudes towards recycling and sustainability. Desk research was also conducted to review each company's commitments to sustainable packaging and their progress to date. We reached out to all eight companies. We received responses from all eight companies and direct feedback on our findings from six out of the eight.

7 New Plastics Economy, Global Commitments Definitions, https://www.newplasticseconomy.org/assets/doc/13319-Global-Commitment-Definitions.pdf

SECTION 2: PRIMARY FINDINGS

The following section provides three key findings from the assessment of the recyclability of packaging and effectiveness of packaging labelling for 11 popular global household products in the nine countries.

Figure 3: Average of % product packaging weight not easily recyclable in practice across all nine countries

COMPANY	PRODUCT	VOLUME	AVERAGE OF % PACKAGING WEIGHT NOT EASILY RECYCLABLE IN PRACTICE
Kellogg's	Pringles	≈200g	84%
Mars	M&M Peanut Chocolate	≈100g	67%
Nestlé	Kit Kat	≈50g	64%
Mars	Whiskas Adult/Junior Wet Cat Food	≈85gX12	40%
Mondelez International	Toblerone	≈60g	36%
Nestlé	San Pellegrino Sparkling Water	≈1l	23%
Kraft Heinz	Heinz Chili Sauce/Tomato Ketchup	≈250g	19%
Unilever	Dove Body Wash	≈1l	18%
The Ferrero Group	Nutella Hazelnut Spread with Cocoa	≈300g	16%
Nestlé	Nescafé Original Jar	≈300g	12%
The Coca-Cola Company	Coca-Cola Mini/Normal Can Pack	≈200mlX6	2%
Average			**35%**

1. **Consumers in all nine countries are unable to easily recycle all of the products that were assessed in practice.**

   a. On average, 35% of the packaging weight across all 11 products is not easily recycled in practice.
   b. 17% of the total weight of packaging for all 99 individual products across the nine countries is not easily recyclable in practice.
   c. Across all products and all markets included in this assessment our consumer advocacy experts noted the lighter packaging pieces containing plastic were often the packaging pieces not easily recyclable in practice.

Figure 4: Average % of packaging weight not easily recyclable in practice and quality of labelling information across the 11 products in each country

COUNTRY	AVERAGE OF % PACKAGING WEIGHT NOT EASILY RECYCLABLE IN PRACTICE	QUALITY OF LABELLING INFORMATION*
Hong Kong	7%	🔴
Portugal	10%	🔴
Australia	14%	🟢
India	23%	🟠
UK	32%	🟠
Malaysia	37%	🟠
France	39%	🟢
New Zealand	57%	🟠
Brazil	92%	🟢
Average	**35%**	

*Green (over 8 products with recycling information provided), Amber (5-8), Red (4 and below)

2. **There was misleading, unclear, and confusing labelling on all of the products assessed.**

   a. No product was labelled clearly across all nine countries. In some cases, when the packaging is recyclable, the labelling did not provide that information.
   b. In Portugal M&M Peanut Chocolate packaging is 100% recyclable but, according to the label, should be placed in the bin and not recycled.
   c. In Australia and New Zealand, labelling information on Nestlé San Pellegrino was European and not applicable or commonly understood by the consumers.

3. **Packaging recyclability and labelling information varied across the nine countries.**

   a. There is a vast difference in how easy it is to recycle the 11 product's packaging in practice across the nine countries.
   b. In Hong Kong, on average 93% of the packaging weight across the 11 products was easily recyclable in practice. While in New Zealand, on average 57% of the packaging weight was not recyclable in practice.

Please refer to Annex 1 for the full list of product findings.

IMPLICATIONS OF 'NOT EASILY RECYCLED IN PRACTICE' - EXAMPLES FROM OUR FINDINGS:

- In New Zealand, despite one product being widely collected by local council and cities, there is only a very small chance it gets recycled.
- In Brazil, despite many products being labelled as recyclable, Brazilian recycling infrastructure only recycles up to 4% of its waste, meaning that the majority of products would likely end up in landfill.
- In Hong Kong, the majority of packaging is recyclable in practice according the local expert. However, this is sometimes difficult to quantify due to a lack of clarity in the recycling industry.

Of the companies who responded to our findings, the Ferrero Group stated that Brazilian recycling infrastructure is a challenge they are currently working to address. Kraft Heinz noted that the plastic recycling rate in Brazil is 22%. However, as this varies dramatically between regions, and the national recycling rate remains around 4% it appears unlikely that the majority packaging will be recycled in practice.

SECTION 3: THE CONSUMER EXPERIENCE

The following section places the findings in the context of the broader policy landscape and the unique consumer recycling experience within each of the nine countries. It suggests that consumers willing and motivated to recycle face a lack of information and choice when purchasing everyday products.

LACK OF NATIONAL SUSTAINABLE CONSUMPTION PLANS TO SUPPORT CONSUMERS.

Only 30% of respondents to the Consumers International Global Consumer Protection & Empowerment Survey 2020 stated their country has a national sustainable consumption plan. And only 60% of responses stated their countries have recycling programmes.

Source: Consumers International Global Perception Survey 2020

Governments are responsible for establishing adequate infrastructure and policy frameworks to enable recycling in practice. Over the last decade, all the governments involved in our research have responded to consumer concerns over waste and recycling and have committed to strategies and policies to reduce waste. While many countries have comprehensive strategies for reducing packaging waste, data available[8] suggests recycling rates are still low globally. Available data on packaging waste recycling rates remains limited.

In reality, our research suggests that the implementation of strategies also varies dramatically. In some of the nine countries included in this assessment, we found that inadequate recycling infrastructure limits choice. In others, recycling infrastructure is comprehensive, however we found that packaging lacks clear information. In the majority of the nine countries however, our research suggests that consumers are willing and motivated to recycle. We believe that marketplace actors must lift the burden of responsibility off consumers to close the intention-action gap.

8 W. Nichols and N. Smith, *Waste Generation and Recycling Indices*, 2019 https://www.circularonline.co.uk/wp-content/uploads/2019/07/Verisk_Maplecroft_Waste_Generation_Index_Overview_2019.pdf

Figure 5: Overview of national recycling context, consumer recycling experience and our findings in each country.

	NATIONAL CONTEXT	CONSUMER EXPERIENCE	OUR FINDINGS
NEW ZEALAND	New Zealand is developing a new waste strategy for 2021 that will set the direction and guide investment in waste minimisation and resource recovery challenges in New Zealand. However, recycling rates in New Zealand are very low with an estimated 35% of waste being recycled in 2020. No data is available on packaging recycling rates. Analysis from the government suggests COVID-19 has exacerbated the situation, with many councils suspending recycling collections during lockdown. Consumer advocacy experts suggest the decentralised nature of recycling infrastructure in New Zealand also contributes to their poor recycling rate.	Consumers in New Zealand are concerned about sustainability and are motivated to recycle. A 2019 study found 87% of New Zealanders are concerned about sustainability with 71% conducting active research around sustainability before buying a product. In 2020, Consumers NZ found that 88% of New Zealanders said their household had a recycling bin or bag. The New Zealand consumer also feels that the individual consumer is responsible for reducing waste. A recent Ministry for the Environment report found 87% agree that reducing waste is the responsibility of all New Zealanders. In Consumer NZ's survey, 65% thought companies weren't doing enough to reduce their environmental impact.	The New Zealand consumer is not able to easily recycle in practice, on average, 57% of the packaging weight across the 11 products. Five of the 11 products' packaging is 100% not recyclable in practice - the majority of that packaging is plastic. Labelling was also confusing. Information on Nestlé San Pellegrino Sparkling water indicated it was recyclable. However, the local expert indicated it would not be recycled in practice and likely end up on landfill. Despite the vast majority of consumers equipped with household recycling, a lack of adequate infrastructure and packaging not suited to the local context left them with little choice.
HONG KONG	Hong Kong's 2021 Waste Blueprint for Hong Kong 2035 commits to waste reduction, resources circulation and zero landfill. In 2019 municipal solid waste recycling rates were at 29%. According to consumer advocacy experts, the key reason for low recycling rates is the lack of local recycling industries and the high cost of recycling in Hong Kong. As a result, the city's recycling rate has been below international standards. There are also no regulatory requirements for recyclability information in Hong Kong.	Data is not readily available for consumer attitudes towards sustainability and recycling in Hong Kong. However, consumer advocacy experts suggest consumers are quite aware of the importance of recycling.	While our findings found the majority of products to be recyclable in practice, a lack of clarity in the recycling process and below par international recycling rates suggest our research does not tell the full picture for the situation in Hong Kong. More importantly perhaps, is the lack of information available for the consumer in Hong Kong. For eight of the 11 products, there was no labelling on how to dispose of the packaging and how much recycled content it has. A lack of regulatory requirements for labelling in Hong Kong prevents consumers from managing their waste sustainably.

	NATIONAL CONTEXT	CONSUMER EXPERIENCE	OUR FINDINGS
AUSTRALIA	Australia's 2018 National Waste Policy commits to less waste, more resources and 100% of Australian packaging to be recyclable, compostable or reusable by 2025. Over 85% of Australian consumers support this plan. Latest figures suggest that recycling rates are at around 58% in 2018. No data is available on packaging recycling rates.	Consumers in Australia are motivated to make sustainable choices. A 2018 study found that 71% of consumers are willing to pay extra for sustainable products and 70% of consumers place waste going to landfill as a top concern. 79% of consumers also think it is the company's responsibility to manage the impact on the environment.	Our research finds Australian consumers are able to easily recycle on average 86% of the recycling packaging weight in practice across the 11 products. However, a lack of clear labelling across some products causes confusion for the consumer and leaves them with few options to make sustainable choices. For example, Kraft Heinz's Tomato Ketchup has no labelling to indicate recycled content and how to dispose of the packaging. The Australian consumer needs all marketplace actors to share the burden of responsibility.
UK	The UK's 2018 Resources and Waste Strategy commits to eliminating avoidable plastic waste over the lifetime of the 25 Year Plan, doubling resource productivity, and eliminating avoidable waste of all kinds by 2050. The most recent data from 2018 suggests 44% of municipal waste is recycled. No data is readily available on packaging recycling rates.	UK consumers are very engaged and motivated to recycle. 87% UK households regularly recycle. There is also a trend towards more consistent levels of recycling with 62% of UK households reporting extra recycling in the past year. However, 77% of UK households identify with at least one barrier leading to them sometimes put items in general rubbish rather than recycling. The most important barrier cited by 38% of households is a lack of clarity on what can or cannot be recycled.	In the UK, despite the consumer being willing to recycle, on average 32% of the packaging weight across the 11 products is not easily recyclable in practice. Which? notes in almost every case it was plastic packaging that could not be easily recyclable in practice. As the national data suggests, a lack of clarity was a key barrier to consumers. Labelling was also a barrier to ease of recycling. For example, Toblerone packaging was recyclable, however the labelling did not indicate this presenting a barrier for the consumer.
PORTUGAL	Portugal is part of the EU's Packaging and Waste Directive to have 65% of all packaging recyclable by 2025 and 70% by 2030. Latest figures from 2019 indicate a packaging recycling rate of 56%.	According to consumer advocacy experts - Government, NGOs and consumer organisations in Portugal are working towards increasing recycling rates to comply with European targets to 2025 and to 2030. Data suggests that Portuguese consumers are willing and motivated to recycle. In 2019, a study indicated that 84% of Portuguese consumers separate their waste.	Portugal performs well in the research due to its comprehensive and well performing recycling infrastructure. However, consumers in Portugal still lack clear information from product packaging. For nine products in our research, the packaging is close to 100% recyclable in practice, however lacked the correct information detailing how to dispose of the packaging sustainability. The products' labelling is preventing consumers from interacting with the strong recycling system.

	NATIONAL CONTEXT	CONSUMER EXPERIENCE	OUR FINDINGS
FRANCE	France is also part of the EU's Packaging and Waste Directive which aims to have 65% of all packaging recyclable by 2025 and 70% by 2030. Latest figures from 2019 suggest France recycles around 46% of its municipal waste. No data is available on packaging recycling rates.	The consumer experience in France is one of engagement and concern towards sustainability. An International Market Research Group (IFOP) survey in 2020 found that 82% of consumers feel concerned by sustainable development with 24% saying they are "completely concerned". Almost all of them already carry out active actions - 88% sort waste and 80% avoid over-consumption. Consumer advocacy is also very engaged in sustainable consumption conservations at the regional and international level.	The French consumer is motivated and willing to recycle, however on average 39% of the packaging weight is not easily recyclable in practice across the 11 products. In line with the wider findings, Union Fédérale des Consommateurs (UFC Que Choisir) notes that the majority of the packaging pieces not easily recyclable in practice were plastic. This includes Kit Kat and M&M Peanut Chocolate packaging. A lack of sustainable packaging alternatives for popular products limits consumer choice.
BRAZIL	Despite having implemented a National Solid Waste Policy in 2011 to decrease the total volume of waste produced nationally and increase the sustainability of solid waste management throughout the country, Brazil still only recycles 4% of its waste nationally.	Some Brazilian consumers do recycle, mostly those that live in bigger cities and have recyclable waste collection However, 17.8 million people in Brazil do not have waste collection at the household or kerbside, let alone recycling. Moreover, according to consumer advocacy experts, making sustainable choices in Brazil is still expensive and currently excludes poor and vulnerable consumers. Products with the sustainable appeal or that use recyclable packaging are generally more expensive.	The research found that the Brazilian consumer would, on average, only be able to recycle 8% of the weight of packaging across the 11 products. This is a shared problem between recycling infrastructure and companies that operate in this market. Systems and infrastructure are currently not serving all consumers to enable them to recycle packaging in practice.
MALAYSIA	Malaysia's National Solid Waste Management Policy 2016 aims to provide a comprehensive, integrated, cost-effective, and sustainable solid waste management system. Latest figures from 2019 suggests Malaysia recycles 28% of its waste. No data is available on packaging recycling rates. There are also no regulatory requirements for recyclability information in Malaysia.	No clear data is available on attitudes and rates of consumer recycling. However, according to consumer advocacy experts, since there is no policy or legislation, nor easily accessible facilities to segregate at source, Malaysian consumers are reluctant to participate in the recycling process. To improve this landscape FOMCA is involved in both national and state initiatives on plastic circularity opportunities.	The Malaysian consumer is not able to recycle on average 37% of the packaging weight across the 11 products in practice. Information was also lacking for the consumer. For example, the Nescafé Original Jar had no labelling information indicating the recycled content and how to dispose of the product. This was also true for Pringles and Heinz Chili Sauce/ Tomato Ketchup. A lack of regulatory requirements for labelling in Malaysia prevents consumers from managing their waste sustainably.

	NATIONAL CONTEXT	CONSUMER EXPERIENCE	OUR FINDINGS
INDIA	India's Solid Waste Management Rules of 2016 focus on the segregation of waste and mandates that waste management should focus on waste recovery, reuse and recycle. Consumer advocates within India indicate that government policies place sustainability as a key goal, however the implementation, monitoring and evaluation, and enforcement of policies that revolve around sustainability are poor.	There is no quantitative data on the extent of recycling done by consumers, however, consumer advocacy experts indicate there is a growing awareness about plastic pollution and the principles of reduce, reuse, and recycle. A recent study done in India showed that eight out of 10 consumers felt that online platforms were using excessive packaging and need to be regulated. Consumer advocacy is also heavily engaged at government level to tackle packaging waste. Citizen Consumer and Civic Action Group (CAG) regularly shares inputs and comments to government policies and draft rules on this topic.	The Indian consumer could easily recycle on average 77% of the packaging weight across the 11 products. However, labelling was a bigger barrier for the Indian consumer. For Heinz Chili Sauce/Tomato Ketchup, Dove Body Wash and Nutella Hazelnut Spread with Cocoa, no information was provided on the packaging at all. Accessible information on packaging provided by companies is crucial as consumer awareness around recycling increases in India.

In summary, we found that the consumer experience across the nine countries varies dramatically with differences between policy, infrastructure and systems. However, similar trends do emerge. Our research suggests that consumers are generally motivated and willing to recycle, but a lack of choice, information and access limits their ability to make sustainable choices. We believe that it is the responsibilities of all market actors, including consumers to prevent the recyclable materials from going to landfill/waste.

SECTION 4: COMPANIES - VOLUNTARY COMMITMENTS AND RESPONSES TO OUR RESEARCH

This section outlines the wider voluntary commitments towards sustainability packaging made by the eight companies. It concludes with a brief overview of responses from the companies involved in the research.

VOLUNTARY COMMITMENTS

Companies are critical actors in providing access to sustainable products that are easy to recycle in practice for all consumers. They can drive progress towards sustainable packaging and set high standards for recycling information across all markets. We believe they also must contribute towards their packaging being collected and recycled in practice.

The eight companies were selected on the basis they are present across all nine markets part of this research and their products are widely available for consumers in each country.

These eight companies have also committed to a substantial global reduction in packaging waste. Seven out of the eight companies are voluntary signatories to the Ellen MacArthur Foundation and United Nations Environment Programme's 'New Plastic Economy Global Commitment[9]' which commits to make 100% of their packaging globally recyclable, reusable, or compostable by 2025. The New Plastics Economy Global Commitment tracks levels of reusable, recyclable or compostable plastic packaging.

9 Ellen MacArthur Foundation website, https://www.ellenmacarthurfoundation.org/resources/apply/global-commitment-progress-report/signatories

Figure 6: Global Commitment 2020 Progress Report – Organisation Reports

	2018	2019	2025 TARGET	PROGRESS
The Kellogg Company				
Reusable, recyclable or compostable plastic packaging	16%	16%	100%	0%
Nestlé				
Reusable, recyclable or compostable plastic packaging	65%	66%	100%	1%
Mars				
Reusable, recyclable or compostable plastic packaging	26%	26%	100%	0%
Unilever				
Reusable, recyclable or compostable plastic packaging	50%	50%	100%	0%
The Ferrero Group				
Reusable, recyclable or compostable plastic packaging	36.4%	37%	100%	0.6%
Mondelez International				
Reusable, recyclable or compostable plastic packaging	Not joined yet	2%	100%	N/A
The Coca-Cola Company				
Reusable, recyclable or compostable plastic packaging	99%	99%	100%	0%

Source: Ellen MacArthur Foundation Global Commitment Progress Report, Organisation Reports[10]

*Post-Consumer recycled content is content created by consumers after a product has reached the end of its use.

10 Ellen MacArthur Foundation website, https://www.ellenmacarthurfoundation.org/resources/apply/global-commitment-progress-report/organisation-reports

The New Plastic Economy Global Commitment does not include reference to the provision of high-quality labelling information. However, our research found that at least three of the companies mentioned in this research (Nestlé, Mars, Kraft Heinz and Mondelez International) have committed to improve consumer information through labelling.

Kraft Heinz is a signatory of the Canada Plastics Pact and the UK Plastic Pact, which are both members of Ellen MacArthur Foundation's Global Plastics Pact network. And they have made similar commitments to make 100% of their packaging globally recyclable, reusable, or compostable by 2025.

Among our tested products and companies, no company has made significant progress towards their commitments over the last two years. The wider progress report of 450+ companies also notes that there has been limited progress on shifting towards recyclable packaging[11] across the board.

COMPANY RESPONSES

We contacted the eight companies with an invitation to share progress towards their commitments and comments on the individual products for inclusion within our research.

The responses indicate that the eight companies are making substantial and transparent efforts towards sustainable packaging. Mars highlighted how they launched a new range of packaging innovations for M&M's and Whiskas products in 2020 across select markets. Kellogg's emphasised that they are redesigning their Pringles can in Europe and testing both steel and paper can packaging. According to Kellogg's, the paper can trial in 2020 was well received by consumers.

However, some challenges have been highlighted in various responses. In some cases, where regulations differ across markets, packaging standards differ. For example, Kraft Heinz note that there are no regulatory requirements in either Hong Kong or Malaysia as far as recyclability information is concerned. The Ferrero Group note that in Portugal and the UK they have not been able to include recycling information on the packaging due to limited space. Instead labelling information is delivered digitally via a link.

Effectively communicating information to the consumer is critical to ensure consumers are not left with the burden of responsibility. We believe companies have a responsibility to rapidly innovate in sustainable packaging and communicate these changes to consumers.

Please refer to Annex 1 for a full overview of company responses.

11 The Global Commitment Progress Report, 2020 https://www.newplasticseconomy.org/assets/doc/Global-Commitment-2020-Progress-Report.pdf

SECTION 5: TAKEAWAYS

This section links the findings from this assessment with the broader consumer experience in each country and the progress towards voluntary commitments made by companies. It surmises five key areas of failure which together prevent progress towards sustainable packaging and enhancing the consumer recycling experience, ultimately inhibiting the global ambition for a circular economy. It poses a series of questions to guide further research outside the remit of this analysis.

RECYCLING IS NOT CURRENTLY WORKING FOR THE CONSUMER

This research highlights a snapshot of the consumer experience across nine countries. It demonstrates how valuable a consumer lens is to understand what is happening locally. This lens offers the view that recycling does not work in the way it should for all consumers. We found that consumers lack sufficient information, choice, access and agency at each point of the recycling journey.

Questions for further research:

- *How can governments, regulators and standard setters create systems that will hold failures to account and generate alternatives?*
- *How can the consumer movement affect marketplace change through the lens of consumer rights, empowerment, and agency to centre the consumer in recycling systems?*
- *Are actors in the marketplace putting too much focus on dealing with recycling from the downstream instead of further up the supply chain?*

ACTORS IN THE MARKETPLACE ARE PLACING THE BURDEN OF RESPONSIBILITY ON CONSUMERS

Our research suggests a lack of coordinated or shared responsibility for the recyclability of products between marketplace actors, leaving the consumer with little option to make sustainable choices. Labelling is often unclear and confusing, even in cases where packaging is recyclable, placing the onus on the consumer to make decisions without sufficient information. This is further compounded by labelling and labelling standards differing across markets. In many cases the consumer is left responsible for the end of life of packaging which they do not know how to manage.

Questions for further research:

- *How should companies adapt packaging to different recycling infrastructures?*
- *What steps should be taken in order to provide locally relevant, clear labelling for the consumer?*
- *Should the 'polluters pay' principle be adopted more widely by governments to encourage more active responsibility further up the supply chain?*
- *How should labelling information be provided – on label or digitally?*

THERE IS UNEQUAL ACCESS TO RECYCLING BEST PRACTICE FOR CONSUMERS

Our research highlights that the consumer journey across different marketplaces and countries varies dramatically. For example, we found that consumers of the same product in two different countries do not have the same opportunities to recycle. This is due to producers creating packaging that does not meet the local recycling infrastructure. Meanwhile, the different levels of adequate national and local recycling infrastructure, especially between urban and rural areas, leave consumers with limited options to recycle packaging in practice. Both recycling infrastructure and packaging are failing the consumer who is motivated to make the sustainable choice.

Questions for further research:

- *How can companies form partnerships with governments and managers of waste infrastructures to understand local recycling capabilities of the countries in which their products are sold and push for change where infrastructure is limiting circularity?*
- *How can governments work across national borders and drive progress towards international set standards on packaging that benefit all consumers?*

VOLUNTARY COMMITMENTS NEED TO BE UPHELD BY A COLLECTION OF MARKETPLACE ACTORS THAT INCLUDE BUSINESSES, GOVERNMENTS, STANDARD SETTERS AND CONSUMERS THEMSELVES

Our research suggests that consumers cannot currently rely on voluntary commitments (such as those referred to in section 4 above) to ensure their products are sustainable. Voluntary commitments have evolved as one part of the puzzle of a complex system. However, alone they are not enough.

Questions for further research:

- *How can companies better learn from each other and share best practice, collaborate to innovate and find solutions to prevent siloed working, beyond global commitments?*
- *How can consumer engagement be integrated into commitments process so that consumer needs are met when shaping global pledges?*
- *Should there be third party certification of voluntary commitments to ensure a robust monitoring of progress?*

FOR PACKAGING TO BE RECYCLABLE, IT HAS TO BE RECYCLABLE IN PRACTICE

Our research indicated that in some cases the full journey of the packaging is not taken into account. For producers 'recyclability in practice' appears to be overlooked. The local experts who contributed to this research found that while a product may be made of recyclable material, it must complement the local infrastructure in order to be recycled in practice. This again raises questions about end-of-life responsibility and accountability.

Questions for further research:

- *Where infrastructure is weak, what is the responsibility on the producer for end of life of packaging?*
- *Should extended producer responsibility strategies be used to incentivise companies to produce recyclable in practice packaging? Should such schemes include raw material producers (for instance of plastics) as well as manufacturers and retailers?*
- *Do policy makers also have the responsibility to legislate in such a way that inspires innovation in business to move towards more sustainable, and recyclable in practice, models?*

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- Hong Kong Consumer Council, Hong Kong
- Proteste, Brazil
- Union Fédérale des Consommateurs (UFC), France
- Which? United Kingdom

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ANNEX 1: COMPANY RESPONSES TO RESEARCH FINDINGS

COMPANY	2020 UPDATE	PRODUCT RESPONSE
Nestlé	Nestlé provided a link to 'Creating Shared Value and Sustainability Report 2020'[12]	No response provided.
Mondelez International	*"On track to achieve 2025 goal for 100% of all packaging designed to be recycled; ~94% of all packaging is already designed to be recycled."*	No response provided.
Kellogg's	*"As of June 2020, Kellogg has achieved 76% recyclability of our packaging, globally. Already, we have one of the smallest plastic packaging footprints among peer food companies."*	*"As part of our commitment, we are redesigning our Pringles can in Europe and have tested both a steel and a paper can there. The Pringles paper can trial in 2020 was well received by consumers. We are also working to increase the recyclability of our current can until a new can is launched."*
The Coca-Cola Company	*"In 2020, our World Without Waste report outlined our latest progress against our goals as follows:* • *88% of our primary packaging is recyclable— with a goal of 100% by 2025, which represents progress since we launched our strategy, contrary to your letter;* • *20% recycled material was used across all packaging materials globally, and 10% for PET which also represents progress since the launch of our strategy.* *N.B not including the bottle's cap and label"*	*"We are focused primarily on consumer packaging… but we are also in the process of extending this work to our secondary packaging, such as plastic packaging that accompanies aluminum can multipacks that you identify in your letter… These innovations support our efforts towards replacing difficult to recycle packaging with easier to recycle options."* *"We intend to continue our work to reach our goal of making sure all of our primary consumer packaging is recyclable by 2025. We will look over your findings as we continue this important work."*

The Ferrero Group	*"Following a complete mapping of the company's packaging materials and policies, The Ferrero Group identified it has already achieved 81,7% of its target for the period 2018-19. Now, a clear roadmap has been laid out with the necessary steps to address each remaining packaging item, with the objective to implement solutions to make 100% of our packaging reusable, recyclable or compostable by 2025."*	*"The total volumes of the Nutella jar, either glass or PET, show an average 97% global recyclability as both are valuable materials, with consolidated collection and recycling schemes in our core countries."* **(Consumers International Response) This does not consider whether packaging is recycled in practice. In all participating countries, members worked with independent waste and recycling experts to test recyclability in practice.** *"Due to the limited availability of space on packaging for communication in Portugal and the UK, we have not been able to include recycling information on our packaging. However, we have included a link from the packaging to our website, which features information on packaging materials to help consumers to recycle and the amount of recycled content."* *"In India, the legislation for packaging is rapidly evolving and we are making the changes required by this evolution. Our end-of-life labelling will be updated and implemented once these packaging legislation changes have taken place."*
Kraft Heinz	No update provided.	In Australia and New Zealand: *"The only non-recyclable component is the tamper evident heat seal between the bottle and the cap. The combined bottle with cap is "widely accepted" for kerbside collection in both Australia and New Zealand (meaning that more than 80% of the kerbside population has access to a council service)."* **(Consumers International Response - This does not consider whether packaging is recycled in practice. In all participating countries, members worked with independent waste and recycling experts to test recyclability in practice.)** *"While Australian and New Zealand law does not require a recycling label on packaging, as a member of APCO we have adopted the Australasian Recycling Logo (ARL) across all new artworks since 2020. We will also include the appropriate ARL logo on the packaging of the tomato ketchup products considered by Consumers International when we next update the artwork for them."* *"There are no regulatory requirements in either Hong Kong or Malaysia as far as recyclability information is concerned and while some products on the market do carry a recyclability logo there is wide variety and appear to be on the basis of the country of origin (for example Japanese origin product carrying the logo as regulated by Japan)."*

Unilever	*"In terms of the Ellen MacArthur Foundation figure that you also mention, we're really pleased that you pulled this out as we're particularly proud of this partnership as a Unilever brand. Firstly, we wanted to highlight that for the reporting period July 2019 to June 2020 Unilever's total plastic footprint is 690,000 tonnes of which 52% was reusable, recyclable, or compostable – which is the case in practice and at scale (i.e., actual recyclability). We continue to make progress on technical recyclability (i.e., packaging designed for recycling but not yet recycled at scale). As recycling infrastructure improves across the countries we operate in, we expect an increase in our actual recyclability which will close the gap on what is technically recyclable. Our parent company Unilever is a long-time collaborator with the Ellen McArthur Foundation on the New Plastics Economy initiative."*	*"When it comes to labelling around recyclability, we ensure that all instructions around recycling are made clear for people, and we are doing more in the space to help educate and inform people on packaging and recycling options."*
Mars	*"As part of our Sustainable Packaging Plan, Mars is rethinking our approach to packaging to ensure that packaging doesn't become waste, and are taking action to ensure 100% of our packaging is reusable, recyclable or compostable by 2025. We are doing this by reducing the packaging we don't need, and to redesign the packaging that we do need so it's recyclable, reusable or compostable, whilst also supporting the scale up of waste management systems."*	*"In 2020, we launched a range of new packaging innovations, including: enrolling in reuse programs with Loop and Perfect Fit®; switching to a mono-material M&M®s pouch in France; piloting our Colorworks® bulk dispensing of M&M's® in several EU markets; redesigning display cases for WHISKAS® cat treats pots in two markets; increasing recycled content in our Petfood pouches; and reducing the size of our confectionary pouches in the U.K. We plan for this momentum to continue into 2021."*

*These are extracts taken from responses intended to accurately and honestly represent the views of the company. Consumers International would like to thank all the companies for their response and providing key context. We welcome invitations to carry on this dialogue.

**A full overview of product findings can be found in the annex.

CONSUMERS INTERNATIONAL
COMING TOGETHER FOR CHANGE

Consumers International brings together over 200 member organisations in more than 100 countries to empower and champion the rights of consumers everywhere. We are their voice in international policy-making forums and the global marketplace to ensure they are treated safely, fairly and honestly.

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