Plastic forever

A report on avoidance strategies to delay action on plastic reduction





The information in this document has been obtained in good faith from sources that are believed to be reliable, but any potential interpretation of this report as making an allegation against a specific company or companies named would be misleading and incorrect. The authors accept no liability whatsoever for any direct or consequential loss arising from the use of this document or its contents.

Published in July 2023



The authors gratefully acknowledge financial assistance from the LIFE Operating Grant for this publication.

The content of this publication is the sole responsibility of its authors and cannot be regarded as reflecting the position of the funders mentioned above. The funders cannot be held responsible for any use that may be made of the information contained therein.

AM

(Introduction) We urge companies to deplastify now

DEPLASTIFY /di:'plæstifai/ verb. \diamond The action of planning and implementing the drastic reduction of the production and use of all plastics in economic activities throughout the entire value chain, in accordance with circular economy principles. This process requires the transitioning from plastics (particularly linear / single use plastics) to sustainable alternative materials and systems of consumption, such as reuse and refill.

Over the last decades, the use of plastic worldwide has grown exponentially, with 368M tons of plastics produced in 2020¹. In comparison, the total global adult population is of 342M tons². Every year, we produce more plastic than we weigh. Every plastic produced has an impact. At every step of their lifecycle^{3,4}, plastics release hazardous substances that contaminate the air, water and soil, and contribute to climate change through the emission of greenhouse gases⁵. Marine ecosystems are particularly affected by the growing presence of plastics. Once

Plastic is a threat for natural ecosystems and human rights.

they sink down to the depths, they break down and remain there, threatening marine species and poisoning the whole food chain by releasing their chemical additives. Moreover, the chronic exposure both to plastic particles themselves and to associated chemicals plastics can threaten human rights and health⁶ on a global scale. Humans are exposed to a large variety of toxic chemicals and microplastics through inhalation, ingestion, and direct skin contact, all along the plastic lifecycle⁷. Facilities for plastic production and plastic elimination (petrochemical plants, recycling or incineration plants, landfills) can severely impact front-line communities, by contaminating air, water and soils, thereby compromising these communities' right to a healthy environment.

Urgent action is vital, as given the current trend, plastic pollution could triple by 2040⁸.

- 1. "PLASTICS THE FACTS 2021, AN ANALYSIS OF EUROPEAN PLASTICS PRODUCTION, DEMAND AND WASTE DATA", PLASTICS EUROPE HTTPS://PLASTICSEUROPE.ORG/KNOWLEDGE-HUB/PLASTICS-THE-FACTS-2021/
- 2. HERE IS AN ESTIMATED 5,517 BILLION ADULTS AND THE AVERAGE BODY MASS WAS 62KG IN 2005. WE CAN THEREFORE AS-SUME THAT THE TOTAL WEIGHT OF ALL HUMAN ADULTS IS OF 342M TONS. "WORLD POPULATION PROSPECTS 2022", UNITED NATIONS POPULATION DIVISION <u>HTTPS://POPULATION.UN.ORG/WPP/DOWNLOAD/STANDARD/POPULATION/</u> "THE WEIGHT OF NATIONS: AN ESTIMATION OF ADULT HUMAN BIOMASS." WALPOLE, SARAH CATHERINE, DAVID PRIETO-MERI-NO, PHIL EDWARDS, J CLELAND, GRETCHEN A. STEVENS AND IAN ROBERTS. BMC PUBLIC HEALTH 12 (2012): 439 - 439. HTTPS://DOI.ORG/10.1186/1471-2458-12-439
- 3. "PLASTIC PELLETS: NEW REPORT OUT EXPOSES ALARMING IMPACTS ACROSS EUROPE", 19/11/2022, SURFRIDER FOUNDATION EUROPE <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/11/REPORT-PELLET-POLLUTION-2020.PDF</u>
- 4. "MARINE PLASTIC POLLUTION AS A PLANETARY BOUNDARY THREAT THE DRIFTING PIECE IN THE SUSTAINABILITY PUZZLE", 2018, PATRICIA VILLARRUBIA-GÓMEZ SARAH E. CORNELL JOAN FABRES <u>HTTPS://DOI.ORG/10.1016/J.MARPOL.2017.11.035</u>
- 5. PLASTIC LEAKAGE AND GREENHOUSE GAS EMISSIONS ARE INCREASING, OECD, HTTPS://WWW.OECD.ORG/ENVIRONMENT/PLASTICS/INCREASED-PLASTIC-LEAKAGE-AND-GREENHOUSE-GAS-EMISSIONS.HTM
- 6. "PLASTICS & HEALTH", 2019, CENTER FOR INTERNATIONAL ENVIRONMENTAL LAW (CIEL) <u>HTTPS://WWW.CIEL.ORG/PLASTICANDHEALTH/</u>
- 7. «A DETAILED REVIEW STUDY ON POTENTIAL EFFECTS OF MICROPLASTICS AND ADDITIVES OF CONCERN ON HUMAN HEALTH», 2020, CAMPANALE, CLAUDIA, CARMINE MASSARELLI, ILARIA SAVINO, VITO LOCAPUTO, AND VITO FELICE URICCHIO, INTERNA-TIONAL JOURNAL OF ENVIRONMENTAL RESEARCH AND PUBLIC HEALTH 17, NO. 4: 1212. <u>HTTPS://DOI.ORG/10.3390/IJERPH17041212</u>
- 8. "FROM POLLUTION TO SOLUTION: A GLOBAL ASSESSMENT OF MARINE LITTER AND PLASTIC POLLUTION", 2021, UNITED NATIONS ENVIRONMENT PROGRAMME – UNEP HTTPS://WEDOCS.UNEP.ORG/BITSTREAM/HANDLE/20.500.11822/36965/POLSOLSUM.PDF

Strategies based on recycling and bioplastics are failing to cope with the plastic crisis

After several decades of deployment, recycling has proven to be unable to cope with the ever growing plastic production. Production has completely surpassed the existing capacity to manage the waste generated, even within "developed countries". According to the Organisation for Economic Cooperation and Development (OECD), in 2019 only 14% of all plastics were recycled in the European Union⁹ and only 9% worldwide¹⁰.

Despite decades of research and development, many types of plastics remain unrecyclable¹¹. The diversity of plastics, additives and materials combinations make mechanical recycling¹² difficult for many plastics, particularly for flexible packaging

and multi-material packaging. The recent development of chemical recycling¹³ cannot provide a solution for many of these non-recyclable plastics. Chemical recycling is not only carbon intensive; it may also generate even more health issues for consumers by releasing more toxic chemicals¹⁴. But even when the right technology exists and the plastic is collected, recycling remains very expensive compared to producing virgin plastics. Recycling has proved to be a very costly solution that critically burdens municipalities and citizens.

As the OECD puts it, "The current plastics life-cycle is far from circular"¹⁵. Most plastics will never be recycled. But even recycled plastics fail to enter a closed loop. Only 2% of plastics are recycled more than once¹⁶. The process of recycling continuously downgrades the material properties of plastics and polymers inevitably experience a chemical degradation. A plastic item will inevitably become waste, and recycling is just a way of delaying the process. Recycling should be continued and even increased, but it should not be presented as a priority solution to tackle the issue.

- 9. "PLASTIC POLLUTION IS GROWING RELENTLESSLY AS WASTE MANAGEMENT AND RECYCLING FALL SHORT, SAYS OECD", 22/02/2022, OECD <u>HTTPS://WWW.OECD.ORG/NEWSROOM/PLASTIC-POLLUTION-IS-GROWING-RELENTLESSLY-AS-WASTE-MA-NAGEMENT-AND-RECYCLING-FALL-SHORT.HTM</u>
- 10. "THE GLOBAL PLASTICS OUTLOOK: ECONOMIC DRIVERS, ENVIRONMENTAL IMPACTS AND POLICY OPTIONS", 22/02/2022, OECD HTTPS://WWW.OECD-ILIBRARY.ORG/SITES/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENT/PUBLICATION/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENTALINA
- 11. "BEWARE OF PLASTIC FAKE OUTS: RELYING ON RECYCLING TO ELIMINATE ALL OUR PLASTIC WASTE", 2020, SURFRIDER FOUNDATION EUROPE <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_RECYCLING_EN.PDF</u>
- 12. «MECHANICAL RECYCLING REFERS TO THE PROCESSING OF PLASTICS WASTE INTO SECONDARY RAW MATERIAL OR PRO-DUCTS, WITHOUT SIGNIFICANTLY CHANGING THE CHEMICAL STRUCTURE OF THE MATERIAL. IN OTHER WORDS, THE POLYMER CHAINS ARE NOT CHEMICALLY DISRUPTED IN THE PROCESS. IT IS CURRENTLY ALMOST THE SOLE FORM OF RECYCLING IN EUROPE, REPRESENTING MORE THAN 99% OF THE QUANTITIES RECYCLED». FROM "MECHANICAL RECYCLING", ROYAL SOCIETY OF CHEMISTRY, <u>HTTPS://WWW.RSC.ORG/GLOBALASSETS/22-NEW-PERSPECTIVES/SUSTAINABILITY/PROGRESSIVE-PLASTICS/</u> EXPLAINERS/RSC-EXPLAINER-5---MECHANICAL-RECYCLING.PDF
- 13. «THE TERM 'CHEMICAL RECYCLING' HAS NO FORMAL DEFINITION BUT REFERS TO A DIVERSE SET OF CHEMICAL ENGINEERING TECHNOLOGIES. IN GENERAL, THESE TECHNOLOGIES SUBJECT PLASTIC WASTE TO A COMBINATION OF HEAT, PRESSURE, AND/ OR OTHER CHEMICALS INSIDE SOME FORM OF REACTION VESSEL. THE PRODUCT OF THIS PROCESS CAN THEN, THEORETICAL-LY, BE MADE INTO NEW PLASTICS OR FUEL, DEPENDING ON THE TECHNOLOGY AND POST-PROCESSING USED». FROM «CHEMICAL RECYCLING: STATUS, SUSTAINABILITY, AND ENVIRONMENTAL IMPACTS», 2020, GAIA (GLOBAL ALLIANCE FOR INCINERATOR ALTERNATIVES). HTTPS://WWW.NO-BURN.ORG/WP-CONTENT/UPLOADS/CR-TECHNICAL-ASSESSMENT_JUNE-2020.PDF
- 14. "UNPACKING THE COMPLEXITY OF THE PET DRINK BOTTLES VALUE CHAIN: A CHEMICALS PERSPECTIVE", 2022, GERASSIMIDOU, S., LANSKA, P., HAHLADAKIS, J.N., LOVAT, E., VANZETTO, S., GEUEKE, B., GROH, K.J., MUNCKE, J., MAFFINI, M.V., MARTIN, O.V., & IACOVIDOU, E., JOURNAL OF HAZARDOUS MATERIALS 430, 128410. <u>HTTPS://WWW.SCIENCEDIRECT.COM/SCIENCE/ARTICLE/PII/S0304389422001984</u>
- 15. "THE GLOBAL PLASTICS OUTLOOK: ECONOMIC DRIVERS, ENVIRONMENTAL IMPACTS AND POLICY OPTIONS", 22/02/2022, OECD HTTPS://WWW.OECD-ILIBRARY.ORG/SITES/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENT/PUBLICATION/DE747AEF-EN/
- 16. "BEWARE OF PLASTIC FAKE OUTS. RELYING ON RECYCLING TO ELIMINATE ALL OUR PLASTIC WASTE", 2020, SURFRIDER FOUN-DATION EUROPE <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_RECYCLING_EN.PDF_</u>

Meanwhile, substituting virgin plastics with so-called "biobased" or "biodegradable" plastics fails to deal with all the negative impacts and may generate new ones¹⁷. Biobased plastics are partly composed of organic materials (cane sugar, corn starch or potato starch) which for the most part are coming from intensive and polluting farming and compete with human food-based agriculture and natural habitats. They may also contain a large proportion of virgin plastic¹⁸. The production and end-of life of biobased plastics is just as polluting as in the case of virgin plastics. As the International Union of Pure and Applied Chemistry (IUPAC) puts it, "a biobased polymer or polymeric device is not necessarily environmentally friendly nor biocompatible nor biodegradable, especially if it is similar to a petro-based (oil-based) polymer."¹⁹ Biodegradable plastics break down into simple elements such as carbon, hydrogen or oxygen, releasing a considerable number of additives in the soil), but most of them require industrial compositing facilities to degrade (temperatures of more than 50°, a high moisture rate and selected micro-organisms). Their degradation in natural ecosystems - and particularly in marine ecosystems - is not easy²⁰: the process takes an unacceptable amount of time that generates detrimental impacts on habitats and fauna²¹.

Some businesses are responsible for putting massive amounts of plastic on the market, knowingly generating waste that cannot be managed properly. Despite evidence that most plastics cannot have a zero-impact end of life, many companies persist in maintaining a status quo on their use of plastic to secure their existing business models at the expense of our planet and own health. Companies must stop relying on false solutions and start deplastifying their activities, as this is the only way out of global plastic pollution and its devastating environmental

Companies must do their fair share in the effort to deplastify

and human consequences. In other words, companies must measure, plan and implement ambitious plastic reduction targets through the deployment of new distribution and delivery systems (packaging-free, refill, reuse), cutting plastic use, removing plastic and switching to sustainable alternatives. However, the path may be longer than expected as many companies have not yet set any deplastification on their agenda. Even worse: many of them actively fight against plastic reduction.

- 18. "PLASTIC POLLUTION: BEWARE OF PLASTIC FAKE OUTS #2 FALLING INTO THE TRAP OF BIOPLASTICS", 2020, SURFRIDER FOUNDATION EUROPE <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_BIOPLASTIC_EN.PDF</u>
- 19. "TERMINOLOGY FOR BIORELATED POLYMERS AND APPLICATIONS (IUPAC RECOMMENDATIONS 2012)", 2012, VERT, MICHEL, DOI, YOSHIHARU, HELLWICH, KARL-HEINZ, HESS, MICHAEL, HODGE, PHILIP, KUBISA, PRZEMYSLAW, RINAUDO, MARGUERITE AND SCHUÉ, FRANÇOIS. PURE AND APPLIED CHEMISTRY 84, NO. 2: 377-410. <u>HTTPS://DOI.ORG/10.1351/PAC-REC-10-12-04</u>
- 20. "WHY BIODEGRADABLES WON'T SOLVE THE PLASTIC CRISIS", 05/11/2019, KELLY OAKES, BBC FUTURE <u>HTTPS://WWW.BBC.COM/FUTURE/ARTICLE/20191030-WHY-BIODEGRADABLES-WONT-SOLVE-THE-PLASTIC-CRISIS</u>
- 21. "RESPONSE TO THE ROADMAP FOR AN EU POLICY FRAMEWORK FOR BIOBASED, BIODEGRADABLE AND COMPOSTABLE PLASTICS", RETHINK PLASTIC ALLIANCE POSITION PAPER, 2021, <u>HTTPS://RETHINKPLASTICALLIANCE.EU/WP-CONTENT/</u> UPLOADS/2021/10/BIOBASED-AND-BIODEGRADABLE-POSITION-PAPER-RETHINK-PLASTIC-2021.PDF

^{17. &}quot;BEWARE OF PLASTIC FAKE OUTS: FALLING INTO THE TRAP OF BIOPLASTICS", 2020, SURFRIDER FOUNDATION EUROPE, HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_BIOPLASTIC_EN.PDF

businesses' top 5 avoidance strategies on plastics

This report presents 5 avoidance strategies that many companies deploy to delay action on plastic reduction. Each of these strategies is illustrated by emblematic examples of companies that have mastered these tactics on plastics. The companies selected are not the only ones using these old tricks, neither do they limit themselves to a single tactic. These examples are representative of widespread practices that contribute to the intolerable inertia of our societies in managing the plastic crisis.

Shifting the burden away

This section explores how companies such as Nestlé developed strategies that emphasis the role of citizens and local councils in the management of the plastic crisis, thereby minimizing their own role and duty to decrease their plastic use.

Investing in the wrong direction

In this section, we reveal how a large petrochemical company like TotalEnergies has structured its investments and Research & Development strategy towards creating new capacities in virgin, recycled or bioplastic production. With this strategy, the company locks itself – and the whole of society with it – into long-lasting infrastructures and technologies that knowingly fail to address the plastic crisis.

Striking a chord with consumers

Companies like Adidas and IKKS have developed communication strategies aiming to convince consumers that their products are part of the solution to "save the environment". Through the slogans and logos they use, these companies create the impression that they are committed to reducing their plastic impact and that the consumer can make a difference by buying their products, even though their properties have in no way been proven to have any beneficial impacts on the ocean or the environment.

Using the smoke and mirrors strategy

Unilever provides a good example of how poor plastic reduction performances can be made more beautiful with flattering or unclear calculation methodologies, reporting and rating tools. Sustainability indicators have become some companies' Instagram 'beauty' filters that mask the reality. This section also deals with the misleading concept of 'plastic neutrality', which companies such as CleanHub deploy, thus contributing to delay action.

Acting behind the scenes

Companies such as Coca-Cola have become experts in discretely fighting plastic regulations. This section exposes how, in its own interest, it has skillfully managed over the years to delay, distract, and derail decisive plastic reduction regulations.

Our recommendations

1. Get the right diagnosis

Companies should better understand and acknowledge their responsibility in the plastic crisis. Unless companies fully understand all the impacts of plastic, throughout its lifecycle, on the fauna and flora as well as on human beings, and also the ways in which their activities contribute to the crisis, any action set up by the company will prove flawed and ineffective.

2. Disclose a full plastic assessment

Companies should know the scale of the problem to engage in efficient actions. We call on companies to annually disclose a verified plastic assessment that counts all plastics (virgin, recycled, biobased) used by the company in the course of its business, both upstream and downstream: this includes packaging, plastics related to product production, transport, logistics, promotion, marketing, etc.

3. Define a deplastification pathway

Companies must prove their commitment to plastic reduction. Companies should disclose a deplastification pathway based on a full plastic assessment with enforceable commitments and adapted action plans.

4. Enforce and monitor the company's deplastification

Promises are not enough. Companies should set up adequate budgets, research & development and human resources to comply with their commitments, monitor their efforts and disclose the result every year to make sure they are on the right track.

5. Support plastic reduction regulations

Companies contributing to the dismantling of plastic regulations through active lobbying or through their membership in trade associations are fully responsible for the scale of the plastic crisis and the terrible consequences it generates. The situation requires companies to fully understand their role in these debates. Pro-active company support of ambitious plastic regulations could be a significant game changer for the resolution of the plastic crisis.

(part. 1) Shifting the burden away

Reducing plastic production and consumption is everyone's business. Everyone needs to do their part in fighting global plastic pollution. When a key player escapes responsibility, the collective capacity to solve the issue is at risk. Companies have extensive power over consumers' plastic use. When they choose packaging by default, its composition and the product's retail mode, they have a direct impact on the volumes that must be processed by consumers, local authorities and communities after use. In this respect, companies are expected to take full advantage of the levers of action available to them.

But this is not what they do.

To reduce their own accountability, some companies have decided to emphasize the role of consumers, vulnerable communities, and local authorities in the plastic crisis. In these companies' narrative, plastic pollution occurs because the consumer fails to sort the packaging in the right recycling bin and because local authorities fail to properly manage waste. But this narrative relies on a misconception on the benefits of recycling. Only 9% of plastics are recycled worldwide²², but this is not because consumers do not sort waste. Despite countless investments, many plastics cannot be recycled at competitive prices, and the continuous growth of plastic production and use make it even more difficult for recycling infrastructures to keep up. One may wonder whether it is reasonable for companies to rely on recycling actions taken by consumers and local councils in order to manage the crisis, while putting more and more packaging on the market.

22. "THE GLOBAL PLASTICS OUTLOOK: ECONOMIC DRIVERS, ENVIRONMENTAL IMPACTS AND POLICY OPTIONS", 22/02/2022, OECD. HTTPS://WWW.OECD-ILIBRARY.ORG/SITES/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENT/PUBLICATION/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENTALINA

Nestlé

Nestlé is one of the world's largest food and beverage companies. It is present in 186 countries and its global business portfolio includes more than 2,000 brands that cover almost every category of food and beverages, including healthcare nutrition and pet care. In 2020, the weight of its plastic packaging totalled 1 267k metric tons²³ which represents 0.3% of the worldwide plastic production²⁴. In its five-pillar packaging strategy²⁵, Nestlé emphasizes its stakeholders' role in the end-of-life management of these 1,2 million tons of plastics. Two of the five pillars deal with local authorities and communities, and consumers:

Local authorities and communities

Nestlé aims to 'support infrastructure that helps to shape a waste-free future' as it considers that "successful recycling depends on local authorities providing adequate collection, sorting and processing infrastructure."²⁶ In Indonesia, for example, Nestlé was a partner in Project STOP, a collaboration with cities and governments in Southeast Asia to develop sorting and recycling facilities and a network of waste collectors in coastal areas. With this operation, Nestlé depicts itself as a generous donator to local authorities, rather than a substantial contributor to the pollution taking responsibility for it.

Consumers

Nestlé is also 'working with consumers, retailers and communities to encourage and stimulate responsible behavior'. Through partnerships and new programs, Nestlé's goal is to "*help make recycling an easy seamless process*"²⁷ for consumers. Education with brand communication quickly became one of Nestlé's key actions on packaging in recent years. The (financial) contribution to many clean walks also contributes to shift the responsibility of the plastic pollution from the producer to the consumer.

23. "THE GLOBAL COMMITMENT 2021 PROGRESS REPORT", ELLEN MCARTHUR FOUNDATION HTTPS://EMF.THIRDLIGHT.COM/LINK/N1IPTI7A089D-EKF9L1/@/PREVIEW/1?O

24. ACCORDING TO PLASTIC EUROPE, 367 MILLION TONS OF PLASTIC WERE PRODUCED IN 2020; 1 267K REPRESENTS ABOUT 0.3%. AS FOR THE 148,6 MILLION TONS OF PLASTICS MADE FOR PACKAGING PURPOSES, NESTLÉ REPRESENTS 0,8% OF THE DEMAND. "PLASTICS - THE FACTS 2021, AN ANALYSIS OF EUROPEAN PLASTICS PRODUCTION, DEMAND AND WASTE DATA", PLASTICS EUROPE HTTPS://PLASTICSEUROPE.ORG/KNOWLEDGE-HUB/PLASTICS-THE-FACTS-2021/

25. OUR PACKAGING SUSTAINABILITY STRATEGY, NESTLÉ WEBSITE HTTPS://WWW.NESTLE.COM/SUSTAINABILITY/WASTE-REDUCTION/PACKAGING-STRATEGY

26. "CREATING SHARED VALUE, SUSTAINABILITY REPORT", 2021, NESTLÉ, P.37 <u>HTTPS://WWW.NESTLE.COM/SITES/DEFAULT/</u> FILES/2022-03/CREATING-SHARED-VALUE-SUSTAINABILITY-REPORT-2021-EN.PDF

27. "CREATING SHARED VALUE, SUSTAINABILITY REPORT", 2021, NESTLÉ, P.35 <u>HTTPS://WWW.NESTLE.COM/SITES/DEFAULT/</u> FILES/2022-03/CREATING-SHARED-VALUE-SUSTAINABILITY-REPORT-2021-EN.PDF





The development of this narrative has a substantial consequence: it legitimates the idea that a company is doing its fair share of efforts when turning its packaging into recyclable or recycled plastic. It reinforces the idea that a 'recyclable' plastic which is not recycled is mostly a consumers' and local authorities' failure. It attenuates the responsibility of the company that generated theses plastics and its duty to act for a reduction of its plastic use.

Could Nestlé be operating a transfer of responsibility over the management of its own packaging to local authorities and consumers?

Easier to share the cost than the value?

Nestlé has built its sustainability strategy on the Creating Shared Value concept developed by Porter and Kramer since 2006²⁸. According to this business concept, sustainable action is seen less as the company's duty than as the pursuit of shared value for both shareholders and stakeholders²⁹.

In the face of a major challenge like plastic pollution, Nestlé seems to find an opportunity to empower its stakeholders, for example public authorities, through joint programs and financial support for recycling infrastructures or educational tools. But is it worth the cost of the pollution generated? Needless to say, Nestlé's contributions are a long way from covering the real cost of a growing plastic pollution that local authorities have no choice but to deal with.

What seems to be a transfer of "value creation" through the financing of infrastructures or education programs may turn out to be more of a transfer of responsibility, and hidden costs to Nestlé's stakeholders.

Nestlé claims to be "supporting a future where none of [their] packaging ends up in landfill or litter, on land or in seas, oceans and waterways."³⁰ The choice of the verb 'supporting' is particularly questioning as it seems to imply that Nestlé is here to help, and that someone responsible for dealing with plastic waste is benefiting from its actions.

Yet Nestlé has knowingly chosen to put this plastic on the market despite missing infrastructures. And it has done so at the expense of both local authorities that cannot cope with the ever growing quantities of plastics flowing into the systems, and consumers who pay the cost of plastic pollution through local taxes.

28. "THE NESTLÉ CONCEPT OF CORPORATE SOCIAL RESPONSIBILITY AS IMPLEMENTED IN LATIN AMERICA", 2006, NESTLÉ <u>HTTPS://WWW.NESTLE.COM/SITES/DEFAULT/FILES/ASSET-LIBRARY/DOCUMENTS/LIBRARY/DOCUMENTS/CORPORATE_SOCIAL_RESP</u>

29. "ANNUAL REVIEW 2021", NESTLÉ 2021-ANNUAL-REVIEW-GLOBAL.PDF

30. "CREATING SHARED VALUE, SUSTAINABILITY REPORT", 2021, NESTLÉ, P.37 HTTPS://WWW.NESTLE.COM/SITES/DEFAULT/FILES/2022-03/CREATING-SHARED-VALUE-SUSTAINABILITY-REPORT-2021-EN.PDE

11

Companies will not be able to keep shifting the burden away. The recent announcement made by the California Attorney General, Rob Bonta, instigating investigations on the role of industries in the global plastic pollution crisis³¹, is a signal that these strategies can no longer be considered acceptable.

Businesses have leverages that citizens do not have. The degree of latitude for a giant corporation like Nestlé is tremendous, if only they had the will to reduce their plastic use. Here are some examples of decisions that businesses could make to effectively address plastic pollution:

- Decide to develop a new plastic-free product rather than an over-packaged version.
- Impose the packaging's specifications to its suppliers: the material, the shape, the characteristics, the chemical additives, etc.
- If its supplier does not have the expertise, they can choose to work with other partners, or to invest in valuable R&D to find real plastic-free solutions.
- Supervise the entire logistic chain that brings the product to the customer, including customer experience in the store with a refill/ reuse system.
- Set the selling prices of its products according to their environmental quality for example, or according to other criteria.
- Communicate to consumers the desire for a transition to a plastic-free world, instead of promoting the convenience of single-use plastic.

The only way a company like Nestlé can "create shared value" for its stakeholders over plastic pollution is to take full responsibility for the plastic it has been using and to plan and enforce ambitious deplastification targets.

> 31. "ATTORNEY GENERAL BONTA ANNOUNCES INVESTIGATION INTO FOSSIL FUEL AND PETROCHEMICAL INDUSTRIES FOR ROLE IN CAUSING GLOBAL PLASTICS POLLUTION CRISIS", 22/04/2022, STATE OF CALIFORNIA DEPARTMENT OF JUSTICE OFFICE OF ATTORNEY GENERAL, PRESS RELEASE, <u>HTTPS://OAG.CA.GOV/NEWS/PRESS-RELEASES/ATTORNEY-GENERAL-BONTA-AN-NOUNCES-INVESTIGATION-FOSSIL-FUEL-AND-PETROCHEMICAL</u>

12



(part. 2) **Investing in the wrong** direction

R&D and investments play a key role in defining a company's strategy: they design the pathway to be followed for the following decades. Today, most investments and R&D expenses for plastic concerns are focused on technologies that knowingly fail to fully solve the crisis along: improving recycling, incorporating recycled plastic or bioplastics, etc. Failing to sufficiently invest in the right solution can have impacts over the longterm performance of the company. But the risk goes beyond a single company. Massive investments in solutions that cannot solve the plastic crisis put the future of all at threat. The longer a company keeps investing in options like recycling, the harder it will be to escape path-dependence and create better ways. And when large companies coordinate in order to invest together in false solutions, it becomes even more difficult to break free from the technological lock-in generated.

One might imagine that, faced with a systemic risk such as the plastic crisis, companies would prepare for a deplastified world and invest in plastic-free solutions in order to be ready in a few years.

This is not the case.

Many companies' R&D strategies prepare for a scenario that requires minimal changes in order to secure a continuation of business as usual. It is no surprise these quick fixes fail to address the crisis. And if there is no available solution for deplastification, then there is no transition possible. These expenditures are made at the expense of the investments necessary for deplastification such as zero waste logistics, zero plastic packaging, new retail models, etc. False solutions absorb and waste critical investment resources for the transition.



"Thanks to plastic, the oil industry still has fine days ahead."

Patrick Pouyanné, CEO of TotalEnergies in 2018³²

TotalEnergies is a particularly integrated petrochemical company that incorporates all the oil & gas production, transformation, and distribution processes within its business. As part of its downstream activities, plastic production has been part of TotalEnergies' petrochemical expertise for decades. According to its CEO, TotalEnergies has increased its production of polymers to almost 5 million tons per year³³.

Over the last few years, TotalEnergies has faced growing contestation over its extraction and transformation activities of oil & gas products. The development of its petrochemical capacities – including polymers products – has been a way for the company to diversify its activities in a manner that seemed more acceptable. Ironically, TotalEnergies presented the development of its plastic production as a way to contribute to the climate transition of its clients. For example, in its "Getting to zero" report, the Group did not hesitate to explain how light materials like plastics can help the automotive industry produce lighter and more energy-efficient vehicles³⁴. In view of the burden the boom of heavy SUV production places on climate emissions³⁵, this claim seems quite irrelevant. Needless to say that plastic production and end-of-life management are also significant contributors to climate emissions: an estimate of 1.8 billion tonnes of greenhouse gases were emitted along the plastic lifecycle in 2019 – 3.4% of global emissions³⁶.

- 32. TRANSLATED FROM THE FRENCH : "[GRÂCE AU PLASTIQUE,] L'INDUSTRIE PÉTROLIÈRE A ENCORE DE BEAUX JOURS DEVANT ELLE ». "POUR L'ARABIE SAOUDITE, LE PLASTIQUE, C'EST FANTASTIQUE", 11/10/2018, NABIL WAKIM, LE MONDE, HTTPS://WWW.LEMONDE.FR/ECONOMIE/ARTICLE/2018/10/10/POUR-L-ARABIE-SAOUDITE-LE-PLASTIQUE-C-EST-FANTAS-TIQUE_5367033_3234.HTML
- 33. UNIVERSAL REGISTRATION DOCUMENT 2021, TOTALENERGIES HTTPS://TOTALENERGIES.COM/SYSTEM/FILES/DOCUMENTS/2022-03/DEU_21_VA.PDF
- 34. "GETTING TO ZERO" TOTALENERGIES CLIMATE REPORT 2020, P. 39 HTTPS://TOTALENERGIES.COM/SITES/G/FILES/NYTNZQ121/FILES/DOCUMENTS/2020-10/TOTAL-CLIMATE-REPORT-2020.PDF
- 35. "L'IMPACT ÉCRASANT DES SUV SUR LE CLIMAT", 2020, WWF FRANCE. <u>HTTPS://WWW.WWF.FR/SITES/DEFAULT/FILES/DOC-2020-</u> 10/20201005_ETUDE_L-IMPACT-ECRASANT-DES-SUV-SUR-LE-CLIMAT_WWF-FRANCE.PDF
- 36. "PLASTIC LEAKAGE AND GREENHOUSE GAS EMISSIONS ARE INCREASING », OECD, <u>HTTPS://WWW.OECD.ORG/ENVIRONMENT/PLASTICS/INCREASED-PLASTIC-LEAKAGE-AND-GREENHOUSE-GAS-EMISSIONS.HTM</u>

14

In recent years, the Group has massively invested in new capacities for plastic production. To improve the acceptability of its investments, TotalEnergies has prioritized the development of its plastic strategy on recycling and bioplastics, along three different axes³⁷:

New capacities

TotalEnergies has, for example, recently acquired Synova, one of the French leaders in the production of recycled polypropylene, and has partnered with Plastic Energy for a new pyrolysis unit, with a capacity of 33 kt/year of end-of-life plastic waste in Sevilla (Spain). As regards bioplastics, TotalEnergies holds a 50% interest in a joint venture in a plant with a 75 kt/year production capacity of polylactic acid polymer (PLA) in Thailand. TotalEnergies has produced 60 kt of recycled or bioplastic in 2021 and aims to produce one million tons of recycled or biopolymers by 2030. To reach this target, TotalEnergies will increase the production of its units but also notably invest over €500 million in the Grandpuits complex in France, which will notably focus on the production of bioplastic and ptlastic recycling Even worse, it does not prevent TotalEnergies from investing billions in new petrochemical capacities at the same time (see box).

R&D

The Group announced in 2020 the creation of a consortium including leading actors in the packaging value chain to study the technical and economic feasibility of recycling complex items, such as food-grade packaging. The company partnered with Plastic Omnium to jointly develop recycled polypropylene plastics that meet the standards of automotive spare parts.

Joint initiatives

TotalEnergies is a founding member of the Alliance to End Plastic Waste (AEPW), numbering around 40 companies in the plastics and consumer goods value chain. These companies have committed themselves to investing more than \$1 billion "to help" end plastic waste in the environment, especially in oceans, and to promote recycling solutions for end-of-life plastics. The AEPW consistently highlights the plastic's end-of-life failures and mostly promotes recycling to manage waste. But what about all plastic impacts on climate, biodiversity, water, air, soils, health and human rights all across its lifecycle? By doing so, the AEPW contributes to prolong plastic's production and commercialization at the expense of more effective actions such as plastic reduction.

But the group's strong investment in these new petrochemical activities does not prevent TotalEnergies from investing huge amounts of money in conventional petrochemical infrastructures.

> 37. "UNIVERSAL REGISTRATION DOCUMENT", 2021, TOTALENERGIES HTTPS://TOTALENERGIES.COM/SYSTEM/FILES/DOCUMENTS/2022-03/DEU_21_VA.PDF

Plastic is fantastic, at least for Saudi Aramco and TotalEnergies

In 2018, Saudi Aramco and TotalEnergies signed a joint agreement³⁸ to build a giant petrochemical complex in Jubail, Saudi Arabia. With additional investments by third party investors, \$9 billion in total will be invested, to produce more than 2.7 million metric tons of high value chemicals, including plastics.

TotalEnergies CEO Patrick Pouyanné declared he saw this "world-class complex" as an opportunity to take "advantage of the fast-growing Asian polymer market"³⁹. The group invested in these costly production facilities to flood the Asian market with virgin plastic. This kind of massive investment shows TotalEnergies' gloomy agenda for climate change and plastic pollution. Such massive environmental threat does not prevent TotalEnergies from investing as long as it is profitable. Although life on Earth is at risk, at least "thanks to plastic, the oil industry still has fine days ahead."⁴⁰

The problem is that the production capacities that TotalEnergies is building through its investments and R&D programs far exceed what would be reasonable to produce in a deplastification scenario. TotalEnergies' new capacities in plastics may be tomorrow's stranded assets for the company. Through these massive investments, TotalEnergies may lock itself – and the whole of society with it – in a scenario that requires more and more plastic within the next decades.

Unfortunately, neither recycling, recycled plastic⁴¹ nor bioplastic⁴² will successfully solve the plastic crisis unless accompanied by a strong deplastification strategy. Increasing recycled plastics or bioplastics cannot prevent plastic from reaching the ocean, neither can it reduce sanitary and human rights risks related to plastics.

Companies should now be focusing their efforts on ways to deplastify. Instead of investing in the production of bioplastics or recycled plastics that will disappear soon or later, plastics producers, fast-moving consumer goods companies and retailers should invest today in zero plastic solutions and logistics such as reuse and refill and actively support the development of startups and small companies that propose adapted deplastified services which will help them to reduce their plastic footprint.

38. "ARABIE SAOUDITE : SAUDI ARAMCO ET TOTAL SIGNENT UN ACCORD EN VUE DE CONSTRUIRE UN COMPLEXE PÉTROCHIMIQUE GÉANT" 2018, PRESS RELEASE, TOTALENERGIES. <u>HTTPS://TOTALENERGIES.COM/FR/MEDIAS/ACTUALITE/COMMUNIQUES/</u> <u>ARABIE-SAOUDITE-SAUDI-ARAMCO-ET-TOTAL-SIGNENT-UN-ACCORD-EN-VUE-DE-CONSTRUIRE-UN-COMPLEXE-0</u>

39. IBID.

- 40. TRANSLATED FROM THE FRENCH : "L'INDUSTRIE PÉTROLIÈRE A ENCORE DE BEAUX JOURS DEVANT ELLE [GRÂCE AU PLAS-TIQUE] » "POUR L'ARABIE SAOUDITE, LE PLASTIQUE, C'EST FANTASTIQUE", 11/10/2018, NABIL WAKIM, LE MONDE, <u>HTTPS://WWW.LEMONDE.FR/ECONOMIE/ARTICLE/2018/10/10/POUR-L-ARABIE-SAOUDITE-LE-PLASTIQUE-C-EST-FANTAS-TIQUE_5367033_3234.HTML</u>
- 41. PLASTIC FAKE OUTS #1 « RELYING ON RECYCLING TO ELIMINATE ALL OUR PLASTIC WASTE », 2020, SURFRIDER FOUNDATION EUROPE. <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_RECYCLING_EN.PDF</u>
- 42. PLASTIC FAKE OUTS #2 « FALLING INTO THE TRAP OF BIOPLASTICS », 2020, SURFRIDER FOUNDATION EUROPE. <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_BIOPLASTIC_EN.PDF</u>



(part. 3) Striking a chord with consumers

Nothing sells better than a good cause.

Brands understand how powerful human emotions can be used to make their business successful. The introduction of emotional marketing revolutionized the way companies shaped their brand identity and talked to their customers. Efforts were made to build stories that bring together people and motivate them to act with the brand.

Behind the scenes of corporate strategies to keep on polluting

Plastic Forever

The protection of the ocean – and marine plastic pollution - recently has become one of these good-selling causes adopted by many companies. Unfortunately, a great deal of emotional storytelling ends up promoting false solutions - recycled or bioplastics - that are now known to be incapable of resolving the plastic crisis. In recent years, more and more so-called 'green' products that could 'save (or clean) the ocean' have appeared on the market. Their claims are counterproductive: the ocean will neither be cleaned nor saved with such solution. But they also mislead consumers who agree to pay more for a non-existent effect. Even worse, by eliminating scruples on overconsumption, such claims contribute to increase sales and will thus have an even bigger negative impact on the environment.

17

Adidas

Adidas is a German multinational corporation that designs and manufactures shoes, clothing, and accessories. It is the largest sportswear manufacturer in Europe, and the second largest in the world after Nike, with 21 billion euros of net sales in 2021⁴³. Over half of the sales are from footwear⁴⁴.

Adidas has built its sustainability narrative around the idea that when you love sport, you love nature and want to protect it. Adidas cultivates the idea that an environmental performance is second nature, just like a sporting performance. To illustrate its message, Adidas has developed different projects focusing on the ocean. For example, it launched its "Primeblue" products that contain 50% of recycled beach plastic with the help of Parley for the Ocean. In 2020, Adidas made 15 million pairs of shoes using "recycled plastic" collected on beaches. By involving consumers in waste collection on beaches, Adidas particularly wants to bring the consumer's energy and motivation into the equation. But do they realize that the strategy behind this may jeopardize the ocean?

Ecological matters entered Adidas' advertisement and communication culture to embody what the brand presents at its commitments and new identity. But this introduction generated messages that could be considered misleading for Adidas' customers and stakeholders. For example:

- The Stan Smith Mylo, created in 2021, claims to be 'made with nature' as it is produced with 50-85% biobased mycelium plastics⁴⁵. The claim "made with nature" suggests an ecological performance that the product simply does not have (low impact, biodegradability, etc).
- Adidas registered a trademark "End Plastic Waste"⁴⁶ that has been included on many communication materials. The circular 'planet' shape and the claim chosen both suggest that the products help to reduce plastic pollution, which is questionable as the brand has not committed itself to deplastifying its activities.
- The Futurecraft Loop. The "Made to be remade" collection is a line of monomaterial shoes that is presented as being recyclable. The "Made to be remade"⁴⁷ trademark leaves room to broad interpretations on the product's specifications. In a promotional video⁴⁸ an athlete is seen saying "[she] was excited to discover a shoe that you can recycle infinitely." This is not the case as plastic cannot be recycled infinitely and often requires additional virgin plastic.



HTTPS://WWW.MARKETSCREENER.COM/QUOTE/STOCK/ADIDAS-AG-6714534/FINANCIALS/

- 44. MARKETSCREENER ADIDAS, SALES PER PRODUCTS <u>HTTPS://WWW.MARKETSCREENER.COM/QUOTE/STOCK/ADIDAS-AG-6714534/COMPANY/</u>
- 45. "FAQ", MYLO UNLEATHER. HTTPS://WWW.MYLO-UNLEATHER.COM/FAQ/
- 46. END PLASTIC WASTE APPLICATION #88685031, 2019, UNITED STATES PATENT AND TRADEMARK OFFICE <u>HTTPS://USPTO.REPORT/TM/88685031</u>
- 47. MADE TO BE REMADE APPLICATION #88984461, 2021, UNITED STATES PATENT AND TRADEMARK OFFICE, HTTPS://USPTO.REPORT/TM/88984461
- 48. "[FUTURECRAFT.LOOP] GEN 2: PROOF OF CONCEPT", 15/11/2019, ADIDAS YOUTUBE CHANNEL. <u>HTTPS://WWW.YOUTUBE.COM/WATCH?V=IUGI_VYYEX8</u>

43. MARKETSCREENER ADIDAS FINANCIALS

It may look like a very bold and generous target. But is it? A look at Adidas' definition of "sustainability", may result in disappointment! The brand defines sustainable as "when they show environmental benefits versus conventional articles due to the materials used". These "preferred materials" are mostly recycled materials or so-called "more sustainable cotton". How would you define a sustainable cotton, one that consumes 9,900L of water per kg instead of 10 000L ?⁵⁰ The entire product does not need to be made entirely of these "preferred materials" to be considered "sustainable" according to Adidas's methodology:"⁵¹

- Apparel: 70% of the article's weight is enough
- 50% for accessories and gear
- And only 20% of footwear's weight is need to make the claim.

All these messages give the impression that Adidas is acting against plastic waste and that buying Adidas products will not have a negative impact on the environment. Even better – it may even be part of the solution!

As the chief information officer Andreas Hubert puts it: "People stay with us because they can live their passion for sport and make the planet better for us and the next generations."⁵²

When looking at Adidas' communication, a consumer might think he or she is contributing to ending plastic waste by buying more and more shoes.

Nevertheless, there is a problem. All products have an impact on the environment. All along their life cycle - from extraction to transformation and transportation to their end of life - products can affect ecosystems in many ways. The most that a brand can hope for is that the solutions used to reduce these impacts are effective, and that the product's usefulness justifies the impacts.

Communication that triggers an emotional reaction is even more questionable when the company decides to actively promote non-effective solutions that cannot solve the plastic crisis, such as recyclable, bioplastic or beach plastic sneakers. It is a pity that Adidas has committed itself to promoting these options when reparation and reuse models would work so well for shoes. Developing a functioning secondhand market for reparable and long-lasting shoes would contribute more efficiently to "end plastic waste"!

49. "ANNUAL REPORT", 2021, ADIDAS. HTTPS://REPORT.ADIDAS-GROUP.COM/2021/EN/SERVICEPAGES/DOWNLOADS/FILES/ANNUAL-REPORT-ADIDAS-AR21.PDF

- 50. PRODUCT GALLERY, WATERFOOTPRINT <u>HTTPS://WATERFOOTPRINT.ORG/EN/RESOURCES/INTERACTIVE-TOOLS/PRODUCT-GALLERY/</u>
- 51. "ANNUAL REPORT", P53, 2021, ADIDAS. HTTPS://REPORT.ADIDAS-GROUP.COM/2021/EN/SERVICEPAGES/DOWNLOADS/FILES/ANNUAL-REPORT-ADIDAS-AR21.PDF
- 52. "ADIDAS: LIVE YOUR PASSION FOR SPORT AND MAKE THE PLANET MORE SUSTAINABLE", 07/06/2022, SUSAN GALER, FORBES, HTTPS://WWW.FORBES.COM/SITES/SAP/2022/06/07/ADIDAS-LIVE-YOUR-PASSION-FOR-SPORT-AND-MAKE-THE-PLANET-MORE-SUSTAINABLE/



IKKS

IKKS is a French fashion company founded in 1987 with a sales revenue of 349 million €⁵³.

IKKS' commitment on sustainability is very recent: "it all started in 2019"⁵⁴, says one communication message. In 2021, the brand created a campaign with the bold claim to "free the sea"⁵⁵. Its "silver bullet" solution: 5% of the collection's sales would go to the NGO The Seacleaners, in order to finance a ship factory, planned for 2024, which would be able to collect and sort between 5,000 and 10,000 tons of plastic ocean waste per year.

One of IKKS' iconic new products is a sailor-stripe shirt that claims it can "clean the ocean"⁵⁶. How? It is made of 50% organic cotton and 50% polyester thread produced from recycled marine plastic by the Seaqual initiative⁵⁷.

With messages such as these, IKKS appeals to its consumers' desire to do good, and aligns this with the brand's commitment: if you buy our shirt, then you'll contribute to the protection and cleaning of the ocean. A consumer choice is turned into a moral statement.

But the reality is different. Neither a shirt nor a brand can clean or save the ocean:⁵⁸

- With a shirt weighing an average 350g⁵⁹ and made of 50% ocean plastic and 50% cotton, IKKS would need to sell about 46 billion of these shirts every year to keep its promise and clean the 8 million tons of plastic discharged every year into the sea⁶⁰. In other words, IKKS could give or sell five shirts to every human being on the planet and still fall short of 'cleaning' the annual amount of plastic discharged in the ocean every year. And this does not take into consideration the end-life of the shirts which would inevitably become plastic waste again.
- Most plastics now in the sea cannot be collected. Only a tiny part of plastic remains at the surface; most of the plastic discharged breaks down into microplastics and/or sinks to the depths where they are almost impossible to collect. Even with substantial resources, "cleaning the ocean" will never be an easy mission and IKKS t-shirts are certainly not suited for the problem.
- Besides, there are many other ways in which a shirt can contribute to ocean pollution. When manufactured and washed, textiles release microfibers⁶¹ that end up in the environment. Growing cotton can require large amounts of toxic pesticides and chemical compounds that can affect water quality and marine ecosystems. The rebound effect on sales of such a claim could have terrible consequences for the environment.

53.	"LE GROUPE DE PRÊT-À-PORTER IKKS PASSE AUX MAINS DE SES CRÉANCIERS", 04/06/2019, ZONE BOURSE. <u>HTTPS://WWW.ZONEBOURSE.COM/COURS/ACTION/HONDA-MOTOR-CO-LTD-6492457/ACTUALITE/LE-GROUPE-DE-PRET-A-</u> <u>PORTER-IKKS-PASSE-AUX-MAINS-DE-SES-CREANCIERS-28702567/</u>
54.	"2019 WAS THE TIME WHEN IT ALL STARTED FOR US.", "IKKS ACTS BETTER", IKKS WEBSITE, <u>HTTPS://WWW.IKKS.COM/EN/IKKS-ACTS-BETTER/</u>
55.	"FREE THE SEA" COLLECTION, IKKS WEBSITE. <u>HTTPS://WWW.IKKS.COM/EN/IKKS-COLLECTION-FREE-THE-SEA/COLLECTION/</u>
56.	IBID.
57.	IBID.
58.	"PLASTIC FAKE OUTS #3 : HOPING THAT WE CAN CLEAN ALL THE PLASTIC FROM THE OCEAN", 2020, SURFRIDER FOUNDATION EUROPE <u>HTTPS://SURFRIDER.EU/WP-CONTENT/UPLOADS/2020/07/FBI_CLEANING_EN.PDF</u>
59.	"HOW MUCH DOES A SHIRT WEIGH", BACK INSTITUTE, <u>HTTPS://BATIKINSTITUTE.COM/HOW-MUCH-DOES-A-SHIRT-WEIGH/</u>
60.	"CLEAN OCEANS INITIATIVE", 2022 EUROPEAN INVESTMENT BANK HTTPS://WWW.EIB.ORG/ATTACHMENTS/PUBLICATIONS/THE_CLEAN_OCEANS_INITIATIVE_EN.PDF

61. OCEAN CLEAN WASH, PLASTIC SOUP FOUNDATION, HTTPS://WWW.OCEANCLEANWASH.ORG/



As "ocean plastic"⁶² has little to no effect on marine plastic pollution, and as this option does not prevent a textile from having a negative impact on the ocean, one can consider that the "cleaning the ocean" message is disproportionate, to say the least.

Despite this, IKKS persists in considering its ocean plastic shirts as a "real solution" for making fashion "as sustainable as it can be"⁶³. On its website, the brand claims "You don't make tomorrow's world with the yesterday's clothes."⁶⁴ What is striking about this claim is that recycled plastics are materials and solutions of the past that need to be questioned and reinvented in the world of tomorrow.



Adidas and IKKS flying too high on greenwashing

Just as Icarus burned his wings when he flew too close to the sun, Adidas and IKKS have gone too far on greenwashing. The French Council for Advertisement Ethics (jury de déontologie publicitaire) stated that the Adidas advertisement⁶⁵ for Stan Smith "100% iconic, 50% recycled" shoes and the IKKS sailor-stripe shirt that "cleans the ocean"⁶⁶ were not in line with the Council's recommendations. Both products were criticized for the difference between the reality of their action, in proportion to the messages promoted in their ads.

62.	"THE TERMINOLOGY REFERS TO PLASTIC THAT WAS COLLECTED IN THE OCEAN, OR ON THE BEACH DURING CLE "FIFTY SHADES OF OCEAN (PLASTIC) WASHING A REVIEW OF THE MOST WIDELY-MADE CLAIMS ON PLASTICS AN OCEAN", 2020, SURFRIDER FOUNDATION EUROPE. FIFTY-SHADES-OF-OCEAN-PLASTIC WASHING_BRIEFING_SURFRIDER EUROPE_EN_20221125.PDF	
63.	"FREE THE SEA" COLLECTION, IKKS WEBSITE. <u>HTTPS://WWW.IKKS.COM/EN/IKKS-COLLECTION-FREE-THE-SEA/CO</u>	DLLECTION/
64.	"FREE THE SEA" COLLECTION, IKKS WEBSITE. HTTPS://WWW.IKKS.COM/FR/COLLECTION-IKKS-FREE-THE-SEA/	
65.	ADIDAS – AFFICHAGE – PLAINTE FONDÉE, JURY DE DÉONTOLOGIE PUBLICITAIRE, 2021, HTTPS://WWW.JDP-PUB.ORG/AVIS/ADIDAS-AFFICHAGE-PLAINTE-FONDEE/	
66.	IKKS – INTERNET – PLAINTE FONDÉE, JURY DE DÉONTOLOGIE PUBLICITAIRE, 2022, HTTPS://WWW.JDP-PUB.ORG/AVIS/IKKS-INTERNET-PLAINTE-FONDEE/	

21

(part. 4) Smoke and mirrors

What do plastic-intensive companies do when they wish to avoid deplastifying their activities and yet want to be perceived as acting efficiently? Or even better: as sustainability leaders?

Their secret weapon involves mastering every detail of the company's communication, in particular its sustainability indicators. Sustainability indicators are the Instagram 'beauty' filters of polluting companies: they can make the latter look more attractive than they are. If they look good, if the target seems both ambitious and in the process of being attained, then the company has the power to claim before its shareholders, its consumers, and before public authorities that everything is under control.

In recent years, sustainability indicators have gained importance in companies' annual financial reporting and communication. To address the growing need for sustainability performance monitoring and information – a need expressed both by investors and civil society - a whole set of calculation methodologies and reference frameworks, and a network of independent third-party organizations, non-financial reporting consulting firms and rating agencies have emerged. All these efforts have three goals: to create sustainability indicators that help companies disclose their performance, to harmonize reporting practices, and to generate trust in these indicators. Climate indicators were the first to be structured and harmonized with the aim of being seen as reliable in all sectors of the economy. Today, plastic indicators are under construction with the same objectives. These performance indicators are analyzed and are expected to contribute to providing an overall perception of the company's performance on sustainability.

What is at stake for companies is their perceived performance and their license to operate in a changing world. This being so, the sustainability indicators need to be good. There are many ways to control perception through a subtle "smoke and mirrors" strategy. The preference for a flattering calculation methodology or the use of ambiguous definitions can radically change perceptions. Keeping the methodology confidential or opaque, reducing the reporting scope, remaining vague, putting the spotlight on one-shot initiatives, etc. are only a few of the many tactics companies can use to appear more beautiful than they are.

Unilever

"We believe that the world needs businesses like Unilever more than ever."

Unilever annual report in 2020⁶⁷

Unilever is one of the world's leading suppliers of Beauty & Personal Care, Home Care, and Foods & Refreshment products. With sales in over 190 countries and products used by 2.5 billion people every day, Unilever used around 700k tons of plastic packaging in 2020⁶⁸.

Unilever is one of the companies that has won the most awards on sustainability issues around the world. Every year, the group's performance is awarded with top ratings on sustainability:

- Unilever was awarded S&P Global Gold Glass by the S&P Dow Jones Sustainability Index 2021⁶⁹.
- Unilever was declared #1 corporate sustainability leader by sustainability experts in the 2021 Sustainability Leaders survey by the GlobeScan⁷⁰.
- As in previous years, Unilever is part of the CDP's A-list on climate, forest and water issues⁷¹.

And yet, despite such recognition, Unilever has been ranked among the top 10 biggest plastic polluters for five years in a row, between 2018 and 2022, by the Break Free From Plastic movement⁷². Why is there such a contrast between Unilever's public image and the reality on the ground?

23

67.	"PURPOSE-LED, FUTURE-FIT", 2020, UNILEVER ANNUAL REPORT AND ACCOUNTS. HTTPS://ASSETS.UNILEVER.COM/FILES/92UISEGZ/PRODUCTION/E665693F2BD2EFBBDE5658BAF84043DF7937CFD7.PDF/ ANNUAL-REPORT-AND-ACCOUNTS-2020.PDF
68.	UNILEVER GLOBAL COMMITMENT 2021, ELLEN MACARTHUR FOUNDATION.
	HTTPS://ELLENMACARTHURFOUNDATION.ORG/GLOBAL-COMMITMENT-2021/SIGNATORY-REPORTS/PPU/UNILEVER
69.	S&P DOW JONES SUSTAINABILITY INDEX 2021 HTTPS://WWW.SPGLOBAL.COM/ESG/CSA/YEARBOOK/RANKING/INDEX.ASPX
70.	GLOBESCAN SUSTAINABILITY LEADERS REPORT, 2022
	HTTPS://GLOBESCAN.COM/2022/06/23/2022-SUSTAINABILITY-LEADERS-REPORT/
71.	CARBON DISCLOSURE PROJECT A-LIST 2021
	HTTPS://WWW.CDP.NET/EN/COMPANIES/COMPANIES-SCORES/A-LIST-EUROPE-2021
72.	"BRANDED - FIVE YEARS OF HOLDING CORPORATES PLASTIC POLLUTERS ACCOUNTABLE", 2022, BREAK FREE FROM PLASTIC,
	GLOBAL BRAND AUDITS (2018-2022). <u>HTTPS://BRANDAUDIT.BREAKFREEFROMPLASTIC.ORG/WP-CONTENT/UPLOADS/2022/11</u>
	BRANDED-BRAND-AUDIT-REPORT-2022.PDF

The making of sustainability performance indicators.

Brands shaping their sustainability indicators can use different strategies to adopt methodologies that flatter their performance:

Reducing the scope

Excluding categories of products, activities or markets can contribute to reducing a company's plastic impacts and therefore its duty to act on these unaccounted plastics. For example, most brands focus their performance indicators on packaging, and skip all plastic objects, or plastics used for production, promotion and marketing etc. Some companies may decide to exclude specific categories of products such as discount products. Others may decide to ignore activities carried out in joint ventures or by franchisees. For example, Unilever excludes from all of its sustainability reporting its "operations categorised as joint ventures or investments"⁷³.

Restricting definitions

Some cosmetic or hygiene companies decide to adopt a narrow definition of intentionally-added microplastics that includes only a few types of plastics. For example, Unilever says "we consider microplastics to be solid, water insoluble and non-biodegradable plastic particles up to five millimetres in diameter"⁷⁴. On this basis, Unilever choose to omit biodegradable and water-soluble polymers⁷⁵, and focuses reduction efforts solely on a limited scope of microplastics (such as encapsulates and opacifiers)⁷⁶. And the results are deceptive. Such is the case of the Dove brand, 100% owned by Unilever. The Beat the Microbead platform reveals that on the 1024 Dove products registered, only 163 of them are truly microplastics free⁷⁷.

Using relative vs. absolute indicators

Choosing an absolute or a relative indicator can lead to a very different understanding of the company's performance. An absolute performance can show the total plastic used by a company while artificially inflating or

- 73 "UNILEVER BASIS OF PREPARATION FOR SUSTAINABILITY METRICS SELECTED FOR INDEPENDENT ASSURANCE", P3, 2021 HTTPS://WWW.UNILEVER.COM/FILES/92UI5EGZ/PRODUCTION/333650AF56FE5DDAFBCAF86C7B14D62E074DDAC0.PDF
- 74. "MICROPLASTICS", UNILEVER WEBSITE. <u>HTTPS://WWW.UNILEVER.COM/BRANDS/WHATS-IN-OUR-PRODUCTS/YOUR-INGRE-DIENT-QUESTIONS-ANSWERED/MICROPLASTICS/</u>
- 75. "THE HIDDEN BEAUTY INGREDIENT", BEAT THE MICROBEAD, 2022, <u>HTTPS://WWW.BEATTHEMICROBEAD.ORG/WP-CONTENT/UPLOADS/2022/06/PLASTIC-THEHIDDENBEAUTYINGREDIENTS.PDF</u>
- 76. "GUIDE TO MICROPLASTICS", BEAT THE MICROBEAD. <u>HTTPS://WWW.BEATTHEMICROBEAD.ORG/GUIDE-TO-MICROPLASTICS/</u>
- 77. "PRODUCTS RESULTS, DOVE" BEAT THE MICROBEAD. <u>HTTPS://WWW.BEATTHEMICROBEAD.ORG/PRODUCT-RESULTS/?B=DOVE</u>

deflating the result, depending on its brands' acquisitions or disposals. A relative performance can show the plastic used by the company per million sales, per customer, or per tonnage of product sold, etc., and then show an average that overshadows the impacts of growth: a company can both increase its total plastic use due to growth and decrease its relative plastic use at the same time. In its "Unilever Sustainable Living Plan"78, Unilever calculated its waste footprint "per consumer use"79. This means that overall plastic consumption was divided into an estimated consumer use for each product. Estimating one consumer use can be easy for an ice cream cone. But how should a portion of "consumer use" for a Dove soap or moisturizing cream be estimated? Needless to say, the more "consumer uses" were estimated for one product, the smaller the product's plastic footprint would be. By adjusting this simple parameter, Unilever had the power to significantly improve its perceived plastic performance in the blink of an eye. A 2019 Greenpeace report revealed that despite its commitment to "halve the waste associated with the disposal of [its] products by 2020 compared to 2010"80 per consumer use, "Unilever's volumes of single-use plastic and other packaging have remained flat since 2010"81.

Choosing efforts vs. results indicators

When setting targets and KPIs (Key Performance Indicators), companies are often tempted to select indicators that value efforts rather than effective results. One of Unilever's key targets is to "Ensure that 100% of [its] plastic packaging is designed to be fully reusable, recyclable or compostable" by 2025. In 2021, Unilever reached 53%, with 53% being recyclable and 0% being reusable and compostable. This is a pity when it is known that only 9% of all plastics are recycled worldwide⁸². The indicator chosen does not show the real impact of the company's actions on plastic pollution. Preference for efforts indicators rather than results indicators generates a flattering and deceptive perception of the company's performance.

- 78. "UNILEVER SUSTAINABLE LIVING PLAN 2010 TO 2020 SUMMARY OF 10 YEARS' PROGRESS", 2021, UNILEVER. HTTPS://WWW.UNILEVER.COM/FILES/92UI5EGZ/PRODUCTION/16CB778E4D31B81509DC5937001559F1F5C863AB.PDF
- 79. UNILEVER BASIS OF PREPARATION, 2018, P.9, <u>HTTPS://ASSETS.UNILEVER.COM/FILES/92UI5EGZ/PRODUCTION/BC-4C2E190A17E1E3C1DB4A70C1B2B69AF1841F6F.PDF/UNILEVER-S-BASIS-OF-PREPARATION-2018.PDF</u>
- "UNILEVER SUSTAINABLE LIVING PLAN 2010 TO 2020 SUMMARY OF 10 YEARS' PROGRESS", 2021, UNILEVER. HTTPS://WWW.UNILEVER.COM/FILES/92UI5EGZ/PRODUCTION/16CB778E4D31B81509DC5937001559F1F5C863AB.PDF
- 81. "UNILEVER, TIME TO LEAD US OUT OF THE PLASTIC CRISIS, GREENPEACE, 2019, <u>HTTPS://WWW.GREENPEACE.ORG/STATIC/PLA-NET4-NETHERLANDS-STATELESS/2019/03/B4D9ED80-FACTSHEET-UNILEVER-GREENPEACE.PDF</u>
- 82. "THE GLOBAL PLASTICS OUTLOOK: ECONOMIC DRIVERS, ENVIRONMENTAL IMPACTS AND POLICY OPTIONS", 22/02/2022, OECD HTTPS://WWW.OECD-ILIBRARY.ORG/SITES/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENT/PUBLICATION/DE747AEF-EN/INDEX.HTML?ITEMID=/CONTENTAL INDEX.HTML?ITEMID=/CONTENTAL INDEX.HTML?ITEMID=/CONTENTAL INDEX.HTML?ITEMID=/CONTENTAL INDEX/

25

The making of indices and rankings

Once their indicators are ready, companies like Unilever can answer indices, rankings and Environmental Social and Governance (ESG) questionnaires such as the Carbon Disclosure Project (CDP), Sustainalytics, the Dow Jones Sustainability Index (DJSI), etc. These tools help companies to compare their performance with that of other companies. Each tool is a new opportunity to reach the top and to communicate on their achievements. The more recognition a company gets from using these tools, the more its leadership on sustainability is considered to be consistent and legitimate. But the tools do not always clarify a company's performances on sustainability, particularly in the case of plastics:

Evaluation

Indices are not always clear on what they evaluate precisely: is it transparency or performance? Are good points given because the company reports its results, makes the effort to tell a good story, or because it actually achieves true performance? What issues do they deal with? A performance index can be limited to a few topics (climate, labour rights, water use, etc.) and skip the environmental or social risks posed by many material - such as plastic risk, which is rarely included in indexes. Indices do not penalize poor performances, scandals and revelations on plastics in their notation. Despite these "missing risks", the best rated companies benefit from the aura of a "sustainability leadership" award.

Better-than-average relative performance rather than absolute performance

What is considered efficient by these indices? Indices and ratings do not always place value on what should be done by companies to be sustainable. For plastics, an ongoing process of deplastification could be expected from companies being rewarded. But this is not the case. The aim is rather to reward the Best-in-Class, in other words, the company that made the biggest effort, even if the effort is well below the action necessary. Consequently, companies tend to deliver commitments and performances that are just slightly better than competitors, instead of undertaking adapted transformations.

Unilever has maintained its reputation as a sustainability leader while the bare figures point to Unilever as one of the biggest plastic polluters in the world. It is therefore very doubtful that "the world needs businesses like Unilever". On the contrary, it is becoming increasingly apparent that we need companies that are radically different, companies that have engaged in a true deplastification process rather than increased their plastic use levels, as Unilever has done in the last few years (690k from June 2019 to June 20201 and 713k from June 2020 to June 2021⁸³).

83. "THE GLOBAL COMMITMENT 2022 PROGRESS REPORT", ELLEN MCARTHUR FOUNDATION <u>HTTPS://ELLENMACARTHURFOUNDATION.ORG/GLOBAL-COMMITMENT-2022/OVERVIEW</u>



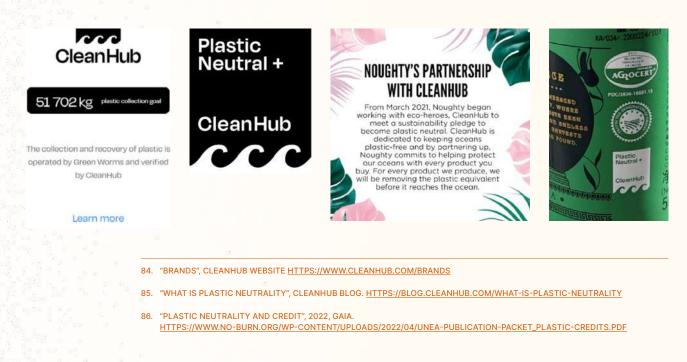
Fancy some plastic-neutral Fuchs spices? Do you prefer plastic-neutral Vuori clothes? Or plastic-neutral Noughti cosmetics? These three brands have one thing in common: they own plastic credits traded by CleanHub. The promise is to help brands become "the preferred brand for responsible customers by becoming plastic neutral."⁸⁴ CleanHub teams up with collection partners that use track and trace technology to record collected volumes. Once collection partners have recovered more plastic from the ocean than the amount of plastic used by the business paying them, the latter can claim plastic neutrality. As CleanHub puts it, its service "is not only about protecting our oceans from plastic pollution, but it also helps you drive sales, increase customer loyalty and boost your brand image." To help companies maximize their reputation for sustainability, CleanHub provides a set of communication tools (recognition stamps on the products, impact trackers on the websites, videos from their hubs, etc).

27

Plastic neutrality: a controversial concept

Plastic neutrality is a plastic accounting mechanism similar to its "carbon neutrality" cousin. It means that "for every amount of plastic created, an equal amount of plastic waste is retrieved from the environment [...]. This can be through waste management efforts, recycling, or the use of plastic credits."⁸⁵ Faced with growing pressures on waste issues, companies are increasingly tempted to claim themselves "plastic neutral" in order to clear themselves of plastic pollution and delay actions for reduction. In recent years, third party companies have been created to offer polluting companies one-tonne tradeable plastic credits⁸⁶.

However, in line with debates on "carbon neutrality", observers have questioned the relevance of the "plastic neutrality" concept and methodology. Plastic neutrality is a threat to concrete action and should be dismissed.



The mere concept of plastic neutrality has sparked several serious controversies that question the relevance of the mechanism:

The rebound effect:

communicating on the plastic neutrality of a packaging can generate a perverse incentive for inaction. If a packaging item is claimed to be plastic neutral, this may artificially reinforce its legitimacy to remain on the market although the right thing to do would be to make it disappear. Thus, claiming plastic neutrality may paradoxically contribute to the continuous increase of plastic use in the future.

End-of-life:

when recovered, plastics can be either incinerated, landfilled or recycled. Some programs are more rigorous than others. But even with a best-case scenario, the end of life cannot be considered "neutral". Plastic incineration can generate intense air pollution and greenhouse gases⁸⁷. Disposal in landfills contributes to methane emissions⁸⁸ and the pollution of water and soils⁸⁹. Even recycling can be a highly polluting water- and energy-intensive process⁹⁰. CleanHub mentions that 95% of the plastic collected is turned into fuel for cement production through incineration⁹¹. Claiming the results of an incineration is "neutral" on the environment does not reflect the reality of its impacts and may confuse consumers.

87. FOR EVERY KILOGRAM OF PLASTIC BURNED, 2.9 KILOGRAMS CO2E IS EMITTED. "PLASTIC IS CARBON UNWRAPPING THE "NET ZERO" MYTH", 2021, CENTER FOR INTERNATIONAL ENVIRONMENTAL LAW (CIEL) AND GAIA, HTTPS://WWW.NO-BURN.ORG/WP-CONTENT/UPLOADS/PLASTIC-IS-CARBON-OCT2021.PDF

88. "PRODUCTION OF METHANE AND ETHYLENE FROM PLASTIC IN THE ENVIRONMENT", 2018, SARAH-JEANNE ROYER, SARA FERRÓN, SAMUEL T. WILSON, DAVID M. KARL, PLOS ONE. <u>HTTPS://DOI.ORG/10.1371/JOURNAL.PONE.0200574</u>

89. "PLASTIC PLANET: HOW TINY PLASTIC PARTICLES ARE POLLUTING OUR SOIL", 2018, BIRGUY LAMIZANA, UN ENVIRONMENT PROGRAMME. <u>HTTPS://WWW.UNEP.ORG/NEWS-AND-STORIES/STORY/PLASTIC-PLANET-HOW-TINY-PLASTIC-PARTICLES-ARE-</u> POLLUTING-OUR-SOIL CITING ANDERSON ABEL DE SOUZA MACHADO, WERNER KLOAS, CHRISTIANE ZARFL, STEFAN HEMPEL, MATTHIAS C. RILLIG. "MICROPLASTICS AS AN EMERGING THREAT TO TERRESTRIAL ECOSYSTEMS", GLOBAL CHANGE BIOLOGY, 2018; DOI: 10.1111/GCB.14020

- 90. "CIRCULAR CLAIMS FALL FLAT AGAIN", 2022, GREENPEACE. <u>HTTPS://WWW.GREENPEACE.ORG/USA/REPORTS/CIRCULAR-CLAIMS-FALL-FLAT-AGAIN/</u>
- 91. "WHAT HAPPENS TO THE WASTE WE COLLECT?" CLEANHUB BLOGPOST, HTTPS://BLOG.CLEANHUB.COM/WHAT-HAPPENS-TO-THE-COLLECTED-WASTE

Proportionality:

the idea that one ton of plastic used equals one ton of plastic collected is not adapted to the reality of plastic pollution. Plastic pollution is an old, complex, diffuse and evolving issue. Plastics accumulate in the ocean in all sizes and shapes over the years, they fragment, and the resulting microplastics sink to the depths of the ocean where they release their toxic and long-lasting additives and become impossible to collect. Given that billions of plastic items have been polluting the ocean for decades, it makes no sense to apply a form of proportionality (1:1) that does not take historical pollution into account. Collecting plastic in the ocean is beneficial for the ocean, providing this is done without any negative environmental impacts, but it is a mistake to align the amount collected with a tonnage of plastics used by a company to claim neutrality.

The scale:

claiming plastic neutrality at company level is highly questionable. The debate has already been raised for carbon issues: carbon neutrality can only make sense at global level⁹². Companies can contribute to global carbon neutrality, but if they declare themselves carbon neutral this may be considered misleading. Similarly, plastic neutrality cannot make sense at company level as the plastic crisis requires the coordinated transformation of whole sections of the economy that cannot be achieved by an individual company.

Plastic neutrality propositions such as CleanHub seem to face serious methodological flaws:

Oversimplification:

plastics have a wide variety of properties and impacts on the environment and health. Some of them – like PET - are recyclable, while others – like PVC – are particularly toxic both during use and during combustion. Some complex packaging can be composed of different layers of materials that cannot be treated separately. Depending on the area of production and collection, plastics may not have the same impacts. For CleanHub, all plastics are worth the same. One ton of plastics used equals one ton of plastics collected, whatever type of plastics have been used and whatever consumption and collection location they may concern.

92. "NET ZERO INITIATIVE: A FRAMEWORK FOR COLLECTIVE CARBON NEUTRALITY", CARBONE 4, 2020. <u>HTTPS://WWW.CARBONE4.</u> COM/FILES/WP-CONTENT/UPLOADS/2020/05/CARBONE-4-NZI-GUIDELINES-EXECUTIVE-SUMMARY-APRIL-2020.PDF

PART. 4

29

Non-additionality:

there is no guarantee that plastic credits bought by CleanHub's clients serve the financing of new infrastructures for plastic collection and disposal. They are more likely to be used to support the existing work of established organizations and infrastructures. In other words: credits may not change things as much as expected, compared to business-as-usual. Similarly, the carbon credit market experience – and particularly the Clean Development Mechanism⁹³ (CDM) – has failed to finance additional efficient and costly infrastructures as expected: "In many ways, it is utopian to assume that the CDM will deliver anything else than cost-efficient credits, which brings the very existence of the CDM into question"⁹⁴.

Immature market:

the plastic market being recent, methodologies for plastic accounting, project selection and credit accountability through third party verification are under construction. There is no harmonized, mature or common framework and guidance for this kind of initiative, leading to an increased risk of transparency issues.

However, overcoming these methodological flaws will not be enough to make plastic neutrality a tool capable of solving the plastic crisis. What a setback plastic neutrality would be if its biggest impact was the removal of guilt over plastic consumption. Wouldn't it be a better solution for companies to invest that money now in their deplastification instead of delaying action?

93. "THE CLEAN DEVELOPMENT MECHANISM AND ITS FAILURE IN DELIVERING SUSTAINABLE DEVELOPMENT", 2012, PETERSEN,
B.V., & BOLLERUP, K., THE JOURNAL OF INTERNATIONAL STUDIES, 8, 74-87.
HTTPS://JOURNALS.AAU.DK/INDEX.PHP/IJIS/ARTICLE/VIEW/503

94. IBID.

(part. 5) Acting behind the Scenes

Many companies work hard to shape a positive image on sustainability. Advertisements, commitments, events, sustainability indexes, etc. - it all is a good way of being seen as Best-in-Class. But behind the sustainable leader image created, companies may have another hidden agenda.

Many companies have worked to position themselves as leaders on plastic action, while at the same time acting discretely to prevent any legislative change in favour of plastic reduction. Their dependence on single use plastics means that plastic reduction threatens their business. The Changing Market Foundation analysed the strategies deployed by many of these companies to delay, distract or derail plastic legislations in order to protect their activities at the expense of the ocean⁹⁵.

^{95. &}quot;TALKING TRASH: THE CORPORATE PLAYBOOK OF FALSE SOLUTIONS TO THE PLASTIC CRISIS", 2021, CHANGING MARKETS FOUNDATION LOBBYING CORPORATIONS. HTTP://CHANGINGMARKETS.ORG/WP-CONTENT/UPLOADS/2021/01/TALKINGTRASH_FULLVERSION.PDF

Coca-Cola

The Coca-Cola Company is a beverage company present everywhere in the world. Coca-Cola uses a greater volume of plastics than any other company worldwide, with over 3.2 million metric tons⁹⁶ which represent 0.9% of the global production of plastic⁹⁷. Coca-Cola also produces the largest amount of plastic waste and has been ranked the biggest plastic-polluting company in every annual Branded Audit report by the Break Free From Plastic movement since 2018⁹⁸. With about 200,000 bottles produced per minute, and around one-fifth of the world's PET-bottle output⁹⁹, Coca-Cola is a company whose action is absolutely necessary in solving the plastic crisis. In its 2020 Talking Trash report¹⁰⁰, Changing Markets identified the three main lobbying tactics deployed by corporations against plastic regulations: delay, distract and derail. "With these three tactics, those with a vested interest in the status quo have dodged, baffled and disarmed all but the most determined of legislators for decades, and sown confusion among consumers and governments alike."¹⁰¹ Coca-Cola is one of the companies that has excelled in the deployment of strategies that maintain a profitable status quo.

96. WHEN YOU CUMULATE THE PLASTIC WEIGHT REPORTED IN 2020 BY THE COCA-COLA COMPANY OF 2,961K TONNES ADDED TO THE 243K TONNES OF PLASTIC FROM SWIRE COCA-COLA LTD. (NOTA BENE: COCA-COLA FEMSA, THAT REPORTED 336,125 METRIC TONS IN THE 2020 EDITION, ISN'T INCLUDED IN THE CALCULATION AS IT WAS ONLY SUBMITTED TO THE FOUNDATION IN 2021. WE THUS EXCLUDED COCA-COLA FEMSA FROM THE ESTIMATION.)

THE COCA-COLA COMPANY, GLOBAL COMMITMENT 2021 SIGNATORY REPORT, <u>HTTPS://ELLENMACARTHURFOUNDATION.ORG/</u> GLOBAL-COMMITMENT-2021/SIGNATORY-REPORTS/PPU/THE-COCA-COLA-COMPANY

SWIRE COCA-COLA LTD., GLOBAL COMMITMENT 2021 SIGNATORY REPORT <u>HTTPS://ELLENMACARTHURFOUNDATION.ORG/</u> GLOBAL-COMMITMENT-2021/SIGNATORY-REPORTS/PPU/SWIRE-COCA-COLA-LTD

COCA-COLA FEMSA IN 2021, GLOBAL COMMITMENT 2021 SIGNATORY REPORT <u>HTTPS://ELLENMACARTHURFOUNDATION.ORG/</u> GLOBAL-COMMITMENT-2021/SIGNATORY-REPORTS/PPU/COCA-COLA-FEMSA

COCA-COLA FEMSA IN 2022, ORGANISATION REPORT FOR 2020 REPORTING CYCLE <u>HTTPS://ARCHIVE.ELLENMACARTHUR-FOUNDATION.ORG/RESOURCES/APPLY/GLOBAL-COMMITMENT-PROGRESS-REPORT/ORGANISATION-REPORTS/REPORT/PPU/RECAE8886KMBUUYK3</u>

- 97. ACCORDING TO PLASTIC EUROPE THERE WAS 368M OF TONS OF PLASTIC PRODUCED IN 2020, THEREFORE 3.2M IS ABOUT 0.9%. "PLASTICS - THE FACTS 2021, AN ANALYSIS OF EUROPEAN PLASTICS PRODUCTION, DEMAND AND WASTE DATA", PLASTICS EUROPE. <u>HTTPS://PLASTICSEUROPE.ORG/KNOWLEDGE-HUB/PLASTICS-THE-FACTS-2021/</u>
- 98. "BRANDED, VOL IV, HOLDING CORPORATIONS ACCOUNTABLE FOR THE PLASTIC & CLIMATE CRISIS" 2021, BREAK FREE FROM PLASTIC <u>HTTPS://WWW.BREAKFREEFROMPLASTIC.ORG/WP-CONTENT/UPLOADS/2021/10/BRAND-AUDIT-REPORT-2021.PDF</u>
- 99. "COCA-COLA ADMITS IT PRODUCES 3 MILLION TONNES OF PLASTIC PACKAGING A YEAR". THE GUARDIAN, 14 MARCH 2019 LAVILLE, S. (ONLINE) <u>HTTPS://WWW.THEGUARDIAN.COM/BUSINESS/2019/MAR/14/COCA-COLA-ADMITS-IT-PRODUCES-3M-TONNES-OF-PLASTIC-PACKAGING-A-YEAR</u>

BUSINESS AND SUSTAINABILITY REPORT, 2018, COCA-COLA HTTPS://WWW.COCA-COLACOMPANY.COM/CONTENT/DAM/JOURNEY/US/EN/POLICIES/PDF/SAFETY-HEALTH/COCA-COLA-BU-SINESS-AND-SUSTAINABILITY-REPORT-2018.PDF

100. "TALKING TRASH: THE CORPORATE PLAYBOOK OF FALSE SOLUTIONS TO THE PLASTIC CRISIS", 2021, CHANGING MARKETS FOUNDATION LOBBYING CORPORATIONS. <u>HTTP://CHANGINGMARKETS.ORG/WP-CONTENT/UPLOADS/2021/01/TALKINGTRASH_FULLVERSION.PDF</u>

101. IBID.

Plastic Forever

Behind the scenes of corporate strategies to keep on polluting

32

Delaying tactics

Delaying tactics - the most straightforward for corporate lobbying - are among the first strategies deployed when new legislation is under negotiation. As the Corporate Europe Observatory (CEO) puts it, 'for corporate lobbyists, success is not always about blocking a measure; securing delays can protect profits for longer and can also open-up further lobbying opportunities to keep influencing and weakening the final outcome into the future.'¹⁰²

One of the top delaying tactics is to promote voluntary commitments. If they look good on paper, companies can use these to delay legislation by giving the public, and therefore policymakers, the impression that they are committed to moving to the right direction without the need for legislative interventions. Companies can also use these commitments to discredit policymakers' understanding and hence impose their expertise, solutions and metrics in their own interest.

Over the years, Coca-Cola has become a master in the art of making voluntary commitments. One of the brand's main moves on plastics has been to invest in recycled PET since the 1990s¹⁰³. The Changing Markets Foundation has brilliantly documented Coca-Cola's three-decade-long trail of broken promises on recycled plastics¹⁰⁴. The company's first commitment to reach 25% recycled plastics was formulated in the 1990s. After several failures, Coca-Cola renewed its commitment to reach 25% recycled plastics in its packaging by 2025. With a mere 13,6% recycled plastic incorporation in 2021¹⁰⁵ - a staggering performance! - it seems doubtful that this new commitment will finally be achieved someday. Not only is the group failing to keep its plastic promises while avoiding sanctions, but it is also directing its poor efforts in the wrong direction. This focus will not solve the plastic crisis as Coca-Cola is not aiming at full deplastification. The substitution of virgin plastics with recycled plastics cannot neither prevent plastic from reaching the ocean, nor solve any of the human rights and health issues that plastic generates. Unfortunately, the narrative deployed by companies like Coca-Cola is persuasive enough to distract policymakers from adopting necessary plastic reduction regulations.

M

Distraction tactics

Distraction tactics aim to divert attention from the real problem. To do this, companies may deliberately promote and highlight false, cheap solutions that will not solve the plastic crisis. The recycling myth was particularly invested and developed by plastic producers, consumer brands and retailers to secure and perpetuate the plastic market over the years. Shifting the responsibility to non-decision-makers such as consumers has also been a way for companies to clear their names from plastic pollution

Blaming consumers for plastic pollution is as old as the mainstreaming of single use disposable plastics. In the 1950s, the progressive replacement of all returnable glass packaging with single use plastics turned into a very profitable operation for the companies now freed from the costs of collection and washing of the containers. To cope with the growing discontent over plastic pollution, American companies created Keep America Beautiful, a movement whose goal was to "educate" the population on waste collection and which deployed anti-litter campaigns that blamed consumers for the pollution. This clever move was enough to shift

^{102. &}quot;PICKING UP THE PLASTICS TRAIL: HOW IRELAND COOPERATED WITH THE PLASTICS INDUSTRY", (2019), CORPORATE EUROPE OBSERVATORY.

HTTPS://CORPORATEEUROPE.ORG/EN/2019/11/PICKING-PLASTICS-TRAIL-HOW-IRELAND-COOPERATED-PLASTICS-INDUSTRY

^{103. &}quot;COCA-COLA GREAT BRITAIN MOVES TO 100% RECYCLED PLASTIC IN ALL GLACÉAU SMARTWATER BOTTLES", 17/06/2019, COCA-COLA GB, PRESS AND NEWS CENTRE. HTTPS://WWW.COCA-COLA.CO.UK/OUR-BUSINESS/MEDIA-CENTRE/COCA-COLA-GREAT-BRITAIN-CONTINUES-SUSTAINABLE-PACKAGING-DRIVE-WITH-MOVE-TO-100-RECYCLED-PLASTIC-IN-ALL-GLAC-AU-SMARTWATER-BOTTLES

^{104. &}quot;TALKING TRASH: THE CORPORATE PLAYBOOK OF FALSE SOLUTIONS TO THE PLASTIC CRISIS", 2021, CHANGING MARKETS FOUNDATION LOBBYING CORPORATIONS.

^{105.} THE COCA-COLA COMPANY GLOBAL COMMITMENT 2022. HTTPS://GC-22.EMF.ORG/DETAIL-PPU/?CID=THE%20COCA-COLA%20COMPANY

the responsibility for pollution onto consumers, a move which clearly benefited the companies involved.

In 1970, the president of The Coca-Cola Company J. Paul Austin declared "litter probably won't be reduced appreciably until the consumer has a greater awareness of the problem and his part in it. So, our Company, other members of the soft drink industry and the manufacturers of the containers we use are right now launching a major effort to inform the consumer and, hopefully to motivate him to do his part in helping reduce the volume of litter"¹⁰⁶. However, attributing plastic pollution to consumers is not a thing of the past. In 2020, Beatriz Perez, Senior Vice President, and Chief of Communications declared that Coca-Cola could not get rid of plastic as they had to accommodate consumers who still liked plastic bottles¹⁰⁷. The 2019 Coca-Cola campaign "Don't buy Coca-Cola- if you don't help us recycle"¹⁰⁸ is another way of letting consumers believe that the success of the whole process is in their hands. Is Coca-Cola fooling us when declaring that a little bit of consumer 'motivation' is all it takes to solve the plastic crisis?



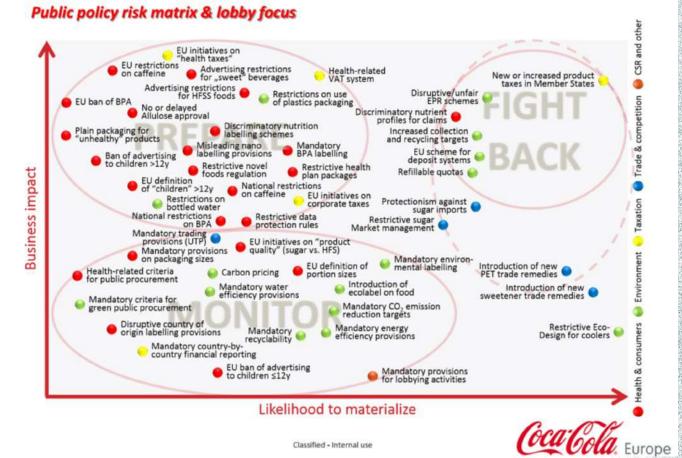
Derailing tactics

Derailing tactics aim at sabotaging the introduction of stricter legislations or undermining existing regulations, thanks to an army of full-time lobbyists who work at every level of political decision-making. Companies are represented through their own corporate lobbyists, but also by numerous trade associations that defend their interests. These trade associations bring together different companies that join forces in the pursuit of a common objective. Besides, many consulting firms support their efforts on demand. This whole network of lobbying professionals has proved its effectiveness in undermining emblematic environmental legislations all around the world.

A document leaked in 2015 by Greenpeace¹⁰⁹ reveals Coca-Cola Europe had identified plastic regulations - such as 'EU schemes for deposit systems' and 'refillable quotas' - as major threats that require "fighting back". In 2018, when the Single Use Plastic Directive was under consideration in the EU, Coca-Cola and its European partners spent over €2.1 million in lobbying during the last two years of negotiation¹¹⁰. New investigations into Coca-Cola's attempts to derail the Deposit Return Scheme in Scotland showed how the company met with senior UK government officials on multiple occasions to try to scuttle plans for the Deposit Return Scheme¹¹¹. But Europe is not the only target for Coca-Cola's aggressive lobbying. More recently, The Intercept received and published an audio clip revealing how Coca-Cola fought back behind the scenes against a bottle bill in Georgia¹¹².

- 106. "ENVIRONMENTAL RENEWAL OR OBLIVION QUO VADIS?", J. PAUL AUSTIN, PRESIDENT OF THE COCA-COLA CO. SPEECH TO THE GEORGIA BANKERS ASSOCIATION ON A MEETING IN ATLANTA, GA., APRIL 16 1970 PRINTED IN THE RECORD WITH NO OBJECTION BY THE DEMAND OF MR. MUSKIE. 116 CONG. REC. (BOUND) - SENATE: APRIL 23, 1970 P.12814-12818. HTTPS://WWW.GOVINFO.GOV/CONTENT/PKG/GPO-CRECB-1970-PT10/PDF/GPO-CRECB-1970-PT10-1-1.PDF
- 107. "DAVOS 2020: PEOPLE STILL WANT PLASTIC BOTTLES, SAYS COCA-COLA", 21/01/2020, DANIEL THOMAS, BBC NEWS. HTTPS://WWW.BBC.COM/NEWS/BUSINESS-51197463
- 108. "RETHINKING PACKAGING : VERS UN MONDE SANS DÉCHETS", COCA-COLA BEL-LUX. <u>HTTPS://FR.COCA-COLA.BE/MIEUX-NOUS-</u> CONNAITRE/A-PROPOS-DE-COCA-COLA/COLLABORATIONS-ET-INVESTISSEMENTS/A-SEAT-AT-THE-TABLE/PACKAGING
- 109. "RADAR SCREEN OF EU PUBLIC POLICIES", 2016, COCA-COLA EUROPEAN PARTNERS. <u>HTTPS://WWW.DOCUMENTCLOUD.ORG/DOCUMENTS/3409808-EU-RADAR-SCREEN-ISSUE-UPDATE-2016-02-03.HTML</u>
- 110. "THE COCA-COLA COMPANY", LOBBY FACTS. HTTPS://WWW.LOBBYFACTS.EU/DATACARD/THE-COCA-COLA-COMPANY?RID=00475641564-03
- 111. "INVESTIGATION: COCA COLA AND THE 'FIGHT BACK' AGAINST PLANS TO TACKLE PLASTIC WASTE", 25/01/2017, MAEVE MCCLENAGHAN, UNEARTHED GREENPEACE. <u>HTTPS://UNEARTHED.GREENPEACE.ORG/2017/01/25/INVESTIGATION-COCA-CO-</u> LA-FIGHT-BACK-PLANS-TACKLE-PLASTIC-WASTE/
- 112. "LEAKED AUDIO REVEALS HOW COCA-COLA UNDERMINES PLASTIC RECYCLING EFFORTS", 18/10/2019, SHARON LERNER, THE INTERCEPT <u>HTTPS://THEINTERCEPT.COM/2019/10/18/COCA-COLA-RECYCLING-PLASTICS-POLLUTION/</u>

Behind the scenes of corporate strategies to keep on polluting



Classified - Internal use

As Coca-Cola CEO James Quincey puts it: "we're using our global presence to build a more sustainable future for our business and the planet while staying laser-focused on growth."¹¹³ The truth may be slightly different. Could Quincey have been trying to say, "we're using our global presence to build a more sustainable future for our business at the expense of the planet because we stay laser-focused on growth"?

113. "BUSINESS & ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT", 2021, COCA-COLA. HTTPS://WWW.COCA-COLACOMPANY. COM/CONTENT/DAM/JOURNEY/US/EN/REPORTS/COCA-COLA-BUSINESS-ENVIRONMENTAL-SOCIAL-GOVERNANCE-RE-PORT-2021.PDF



Conclusion

By providing a series of emblematic examples, this report has demonstrated to what extent the plastic crisis is inadequately addressed by companies. The companies selected are not the only ones relying on these strategies. They illustrate how a collective inertia has

Our economy is addicted to plastic

been purposely set up through ill-adapted investments and communication on plastics. Socalled recyclable plastics are scarcely recycled in practice, and substitutions with bioplastics or recycled plastics that have little impact on plastic pollution act as quack remedies that keep companies from undertaking the required transformations. This mismatch between the problem and the solutions supported by companies has been a way to delay action for years. The current status quo reflects our economy's huge dependence on single-use plastics.

Companies must deplastify now: the business case

This is no longer the time for escape strategies. As expected, since plastic pollution continues to increase at dangerous levels, deplastification is becoming more and more urgent. And it is in the interest of businesses to start the process as soon as possible:

There is no business in a chaotic world.

Businesses need stability to flourish. Exceeding planetary boundaries¹¹⁴ disrupts a fragile equilibrium, which is vital for our own existence and thus for our economic prosperity. Economic activities have no other choice than to be embedded in planetary and human boundaries, including as regards their plastic use, in order to pursue their activities.

Will corporate addiction to plastic remain acceptable?

Plastic overconsumption is becoming more and more controversial in a world suffering unbearable levels of plastic pollution. Businesses cannot cross ecological and human lines, otherwise they may lose their social license to operate, i.e. their ability to obtain the support of a majority of their stakeholders for the continuation of their activities. How many years remain until all businesses have to rapidly drop plastics under the pressure of civil society, investors, clients, local authorities etc.? Are companies ready for that?

Solutions exist.

Solutions exist, at least for a vast majority of plastics, and particularly single use packaging. (at least for a vast majority of plastics, and particularly single use packaging). Modern models of zero waste, reuse and bulk logistics have emerged in recent years, with a whole network of startups, entrepreneurs, motivated communities, and associations ready to embrace the deplastification challenge. The only parts missing are investments and large companies able and willing to adapt and scale up these solutions in every market and for every type of product. And the cherry on the cake is that the more widely a solution is deployed, the cheaper it becomes. Deplastification is the only reasonable answer to our plastic addiction. We call on companies to embrace change and start deplastifying their activity now if they want to maintain their social license to operate and continue their activities in tomorrow's world and in full respect of our people and planet. To achieve this, citizens, with the support of NGOs, and governments, must keep on scrutinizing and denouncing companies' avoidance strategies and false solutions.

114. "SAFE PLANETARY BOUNDARIES FOR POLLUTANTS INCLUDING PLASTICS EXCEEDED SAY RESEARCHERS", 22/01/2018, OWEN GAFFNEY, STOCKHOLM RESILIENCE CENTRE.

HTTPS://WWW.STOCKHOLMRESILIENCE.ORG/RESEARCH/RESEARCH-NEWS/2022-01-18-SAFE-PLANETARY-BOUNDA-RY-FOR-POLLUTANTS-INCLUDING-PLASTICS-EXCEEDED-SAY-RESEARCHERS.HTML

Better to invest once and for all.

The transformation process to reduce plastic is inevitable. It may be long and costly (scouting best solutions, testing them, scaling them up, training suppliers and staff, etc.). This being so, investing now in false solutions such as bioplastics or recycled plastics and ending up having to deplastify your business anyway is a waste of time, resources, and energy. Would it not be wiser to invest these resources once and for all in the right solution – i.e. deplastification – right now?

First mover advantage.

In this collective transition, first movers will have the privilege of tailoring tomorrow's solutions to their own activities, while laggards will have to adapt themselves to solutions developed without them.

